



Resource Management Plan

Final Environmental Impact Statement

Preferred Alternative - Consultation and Coordination



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TABLE OF CONTENTS

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CHAPTER V THE PREFERRED ALTERNATIVE (THE PROPOSED PLAN)

ALTERNATIVE FORMULATION AND THE PROCESS USED	
TO SELECT THE PREFERRED ALTERNATIVE/PROPOSED PLAN . . .	383
OVERVIEW OF PREFERRED ALTERNATIVE	384
Energy and Minerals	384
Oil and Gas	384
Locatable Minerals	384
Phosphates	387
Other Minerals	387
Fish and Wildlife	387
Forest Management	387
Landownership Adjustments and Utility Systems	389
Recreation Management	389
Off-Road Vehicle Management	392
Cultural/Natural History	392
Fire Management	392
Access	393
Soils, Water and Air Quality	393
Livestock Grazing	394
Green Mountain Study Area	394
Gas Hills Study Area	398
Wilderness	398
Areas of Critical Environmental Concern	398
THE PREFERRED ALTERNATIVE AND RATIONALE BY	
MANAGEMENT UNIT	400
Introduction and Background	400
Green Mountain Management Unit	400
Energy and Minerals	401
Oil and Gas	401
Locatable Minerals	401
Fish and Wildlife	401
Forest Management	404
Landownership Adjustments and Utility Systems	404
Recreation Management	406
Off-Road Vehicles	406
Fire Management	406
Access	406
Beaver Creek Management Unit	407
Energy and Minerals	407
Oil and Gas	407
Locatable Minerals	407
Phosphates	410
Fish and Wildlife	410
Rare Plants and Unique Plant Communities	410
Landownership Adjustments and Utility Systems	410
Recreation Management	412

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TABLE OF CONTENTS

Off-Road Vehicles	412
Cultural/Natural History	412
Fire Management	413
Zone 1	413
Zone 2	413
Zone 3	413
Access	413
Lander Slope Management Unit	415
Energy and Minerals	415
Oil and Gas	415
Locatable Minerals	415
Phosphates	415
Fish and Wildlife	415
Forest Management	416
Landownership Adjustments and Utility Systems	416
Recreation Management	418
Off-Road Vehicles	418
Fire Management	418
Access	418
Red Canyon Management Unit	419
Energy and Minerals	419
Oil and Gas	419
Locatable Minerals	419
Phosphates	419
Fish and Wildlife	419
Rare Plants and Unique Plant Communities	421
Forest Management	421
Landownership Adjustments and Utility Systems	421
Recreation Management	422
Off-Road Vehicles	422
Cultural/Natural History	422
Fire Management	422
Access	422
South Pass Management Unit	422
Energy and Minerals	424
Oil and Gas	424
Locatable Minerals	424
Fish and Wildlife	424
Rare Plants and Unique Plant Communities	427
Forest Management	427
Landownership Adjustments and Utility Systems	427
Recreation Management	427
Off-Road Vehicles	427
Cultural/Natural History	427
Fire Management	428
Access	428
Gas Hills Management Unit	428
Energy and Minerals	429
Oil and Gas	429

TABLE OF CONTENTS

Locatable Minerals	429
Fish and Wildlife	429
Landownership Adjustments and Utility Systems	432
Recreation Management	432
Off-Road Vehicles	434
Cultural/Natural History	434
Fire Management	434
Zone 1	434
Zone 2	436
Zone 3	436
Access	436
East Fork Management Unit	436
Energy and Minerals	436
Oil and Gas	436
Locatable Minerals	438
Fish and Wildlife	438
Landownership Adjustments and Utility Systems	438
Recreation Management	438
Off-Road Vehicles	438
Fire Management	441
Access	441
Dubois Badlands Management Unit	441
Energy and Minerals	441
Oil and Gas	441
Locatable Minerals	441
Fish and Wildlife	445
Landownership Adjustments and Utility Systems	445
Recreation Management	445
Off-Road Vehicles	445
Fire Management	445
Access	445
Whiskey Mountain Management Unit	445
Energy and Minerals	446
Oil and Gas	446
Locatable Minerals	446
Fish and Wildlife	446
Landownership Adjustments and Utility Systems	446
Recreation Management	450
Off-Road Vehicles	450
Fire Management	450
Access	450
Dubois Area Management Unit	450
Energy and Minerals	450
Oil and Gas	450
Locatable Minerals	451
Fish and Wildlife	451
Forest Management	451
Landownership Adjustments and Utility Systems	451
Recreation Management	455

TABLE OF CONTENTS

Off-Road Vehicles	455
Cultural/Natural History	455
Fire Management	455
Access	455
Sweetwater Canyon Management Unit (Wilderness Study Area)	455
Sweetwater Rocks Management Unit (Wilderness Study Area)	456
Copper Mountain Management Unit (Wilderness Study Area)	456

CHAPTER V

THE PREFERRED ALTERNATIVE (THE PROPOSED PLAN)

ALTERNATIVE FORMULATION AND THE PROCESS USED TO SELECT THE PREFERRED ALTERNATIVE/PROPOSED PLAN

Both the National Environmental Policy Act (NEPA) and the BLM resource management planning regulations require consideration of a range of alternatives. The basic goal in formulating RMP alternatives was to identify various combinations of public land uses and resource management practices that responded to the planning issues. The alternatives presented in this chapter represent combinations of actions to guide land-use activities and resource management in the Lander Resource Area.

The alternative plans presented in the Lander RMP are the result of a thorough and detailed alternative formulation process. This planning step involves considerable analysis on both a site-specific and regional basis.

During this analysis, it became apparent that development activities are not uniformly spread throughout the resource area. Forestry activities, for example, occur in primarily one area: Green Mountain. Oil and gas activities are more widespread than forestry, but they are still localized. This analysis also showed that conflicts do not occur everywhere development activities take place.

It would be unreasonable to propose reduced development activities in those areas where there were no conflicts to resolve. Instead, the analysis was focused on varying levels of development on those areas where such considerations were reasonable and appropriate.

Therefore, the alternative plans presented in the RMP provide for varying levels of development and nondevelopment activities on appropriate parts of the resource area. These alternative plans provided the decision makers with a range of meaningful options for multiple-use management.

There are four alternatives presented in this document. One alternative, Alternative A, is the no action alternative. This means there would be a continuation of present management. The other three alternatives provide a range of choices offering various options, ranging from an emphasis on resource conservation to an emphasis on production. The preferred alternative is a combination of elements of Alternatives A, B and C.

Alternative A, present management, served as the foundation for formulating other alternatives. During the development of the management situation analysis (see Chapter I, Planning Process), all land-use plans for the Lander Resource Area were compiled into one alternative, Alternative A. The effects of Alternative A were then analyzed to determine if there were better options to the way the resource area was being managed. Through this analysis, it was shown that there were different options for different parts of the resource area.

Because of these differences, it was convenient to portray present management and the options to present management by geographic area or management unit. All together, 13 management units were identified, including the wilderness study areas (see lists in the preferred alternative and rationale by management unit of this chapter).

Once present management was portrayed for each management unit, then all the reasonable options to present management were developed for each management unit (see Appendix 1). Two additional alternative plans for the resource area (alternative B and C) were formulated. This resulted in the consideration of three alternative plans (A, B and C).

Alternatives A, B and C were analyzed first to identify any significant impacts they might cause and to determine how effective they might be at issue resolution. Following this analysis and the consideration of multiple-use tradeoffs, the preferred alternative or plan was selected by choosing among the various options within alternatives A, B and C. This preferred alternative was then analyzed to see if it would change any of the previously identified impacts. It did not. Following that analysis, a cumulative analysis was made to see if the cumulative impacts of the

PREFERRED ALTERNATIVE

preferred alternative would be less than those caused by alternatives A, B or C (see Chapter IV).

OVERVIEW OF PREFERRED ALTERNATIVE (PROPOSED PLAN)

When combined with Management Actions common to All Alternatives (Chapter II), this constitutes our Preferred Alternative.

Energy and Minerals

Oil and Gas

The overall theme for management of the oil and gas resources within the resource area is to make public lands available for leasing to the maximum extent possible, while giving due consideration to the protection of other significant resource values. The potential for the occurrence of oil and gas and the significance and sensitivity of other resource values present in the resource area were used as management tools to aid in the determination of detailed management prescriptions for each management unit.

Less than 1 percent of the slightly more than 2.7 million acres of federal mineral estate within the resource area would be closed to leasing (see map 5-1). All but approximately 12,000 acres of the open acreage would be managed under a management prescription that would allow for enhanced management of the oil and gas resources by being less restrictive of oil and gas development related to other surface resource values in areas rated as having a high potential for the occurrence of oil and gas. In addition, as new information on the potential occurrence of oil and gas in any given area is obtained or new discoveries of oil and gas reserves are made, the potential rating for the area would be revised to reflect the new data. New leases issued in these areas would be issued under the management prescription for that new rating.

Oil and gas leases issued within the resource area would be conditioned with stipulations to protect other important resource values. These restrictions (see Appendix 2) would provide needed protection to other resources and at the

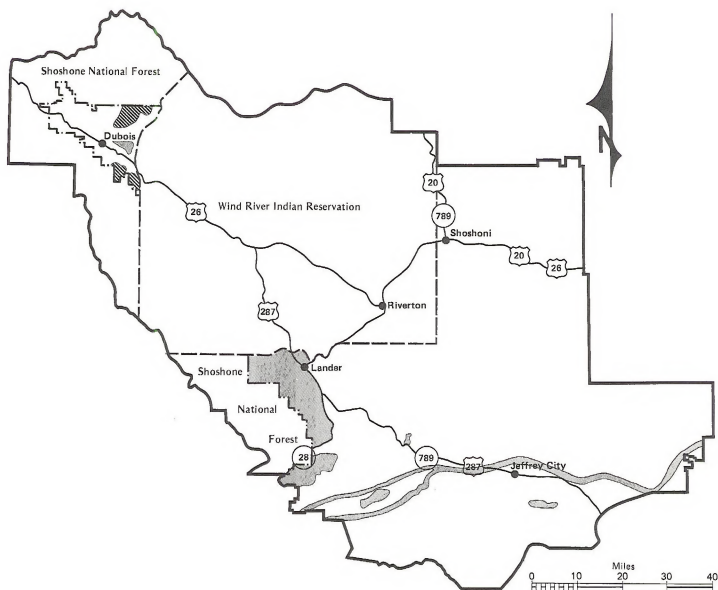
same time allow for as much opportunity as possible to explore for and develop the oil and gas reserves within the resource area.

Geophysical activities associated with oil and gas exploration would generally be restricted in the same manner as other oil and gas exploration and development activities. Geophysical activities don't necessarily have the same impacts on surface resources as do other oil and gas exploration activities, but because of the wide variety of methods and the even wider variety of impacts associated with them, it would be impossible to predict all possible combinations of methods and resources potentially impacted and to develop a management prescription that would be detailed enough to cover all possibilities. If a particular method of geophysical exploration could be conducted within the constraints necessary to protect other resources, it would be allowed.

Locatable Minerals

All federal lands within the resource area would be open to locatable mineral exploration and development unless specifically withdrawn or segregated from appropriation under the mining laws (see map 5-2). At the present time, approximately 1 percent of the federal mineral estate within the resource area is closed to locatable mineral exploration and development. Under the Preferred Alternative, that portion of the resource area that would be closed to locatable mineral exploration and development would increase by 30,000 acres to approximately 2 percent of the total federal mineral estate within the resource area. The additional acreage proposed for withdrawal would be withdrawn to protect crucial wildlife habitat in the East Fork Elk Winter Range and Whiskey Mountain Bighorn Sheep Winter Range, and the remaining acreage would be scattered throughout the resource area in small tracts primarily for the protection of significant cultural and historical resources.

In addition, in an attempt to minimize the acreage withdrawn to protect significant surface values, the Preferred Alternative is to require that plans of operations be approved for all exploration and mining operations (except for casual use) in certain areas that might otherwise be withdrawn, and that notices of intent for operations of 5 acres or less would not be allowed. This would provide for a higher degree of protection for significant surface values, while still providing maximum opportunity to explore and develop the locatable mineral resources within the resource area.



- Open, No Surface Occupancy
- Open with Standard Requirements
- No Leasing

Map 5-1
Oil and Gas Leasing
Lander Resource Area



- Withdrawn (existing & proposed)
- Open, Plans of Operations Required Except Casual Use
- Open with Standard Requirements

Map 5-2
Locatable Minerals
Lander Resource Area

PREFERRED ALTERNATIVE

Phosphates

The Preferred Alternative for the resource area is to allow prospecting, exploration and development, and leasing of phosphate reserves. The phosphate Slope Management Units would require stringent stipulations and mitigation measures to protect significant surface-resource values. The Beaver Creek Management Unit, which contains approximately one-half of the known phosphate reserves, would remain open to exploration, development and leasing with fewer restrictions than would be the case in the Red Canyon and Lander Slope Management Units. In the Red Canyon and Lander Slope Management Units, these restrictions would adversely affect the economic recovery of the phosphate resource (see Appendix 2 for applicable restrictive measures).

Other Minerals

The Preferred Alternative for the resource area is to provide for the exploration and development of other minerals such as sand and gravel, building stone, and other common variety mineral materials on a demand basis and consistent with the limitations and restrictions imposed on oil and gas, locatable minerals, and phosphate exploration and development within the resource area.

Fish and Wildlife

General emphasis in management actions for the fish and wildlife program within the resource area has been established by the Preferred Alternative selected for each management unit. Based on these selections, the following management direction is indicated.

Improvement of aquatic and riparian habitats for fish, beaver, moose, and many other animals would receive top priority in the South Pass and Beaver Creek Management Units, high priority in the Green Mountain Management Unit, and special attention in the Red Canyon Management Unit. Aquatic/riparian habitat management plans would be developed for an area encompassing parts of the upper Sweetwater River and Beaver Creek drainages and for the Green Mountain area.

Improvement of important big game ranges would receive high priority. The use of prescribed burning, cutting, thinning, planting, seeding, pitting, herbicide treatment, or other appropriate

methods would be employed. Priority areas for action would be the Red Canyon and Lander Slope units for elk and other big game habitat, the Whiskey Mountain unit for bighorn sheep, the southwest part of the Beaver Creek unit and the South Pass unit for moose and mule deer, the Green Mountain unit for elk and mule deer, and the Sweetwater Rocks portion of the Gas Hills unit for mule deer. Terrestrial habitat management plans would be developed for the Red Canyon and Lander Slope units, the Sweetwater Rocks, and the south-central part of the Beaver Creek unit.

BLM would continue to work closely with the Wyoming Game and Fish Department (WGFD) in all matters affecting fish and wildlife resources. Habitat management plans would be developed in cooperation with WGFD.

Objectives for some wildlife habitat management actions would be incorporated into other activity plans such as timber management, allotment management, allotment development, or cooperative management plans. This would occur where limited or specialized fish or wildlife objectives could be accomplished through guidance provided by these plans without developing a full-scale, overlapping habitat management plan.

BLM will cooperate with the Wyoming Game and Fish Department, interested sportsmen, conservation groups and adjacent landowners in efforts to develop a workable bighorn sheep reintroduction program for the Sweetwater Rocks area.

Development of small scale, simple or routine habitat improvement projects and maintenance of useful existing projects would be continued throughout the resource area. Such actions would be subject to normal interdisciplinary environmental review, and budgetary and management constraints.

Forest Management

Most of the timber management in the resource area would occur in the Green Mountain Management Unit (see map 5-3). Small volumes may be offered from South Pass and Dubois Units and larger volumes from the Lander Slope unit.

Minor forest products (fuelwood, post and poles, houselogs, etc.) would continue to be sold from timbered areas on a demand basis, depending on resource management objectives.



Forest Management Areas

Map 5-3
Forest Management
Lander Resource Area

PREFERRED ALTERNATIVE

Most fuelwood cutting would occur in the Green Mountain Management Unit.

Sawtimber volumes offered would be approximately 2 million board feet per year and minor forest product volumes would be 1.5 to 2 million board feet from Green Mountain. This would be undertaken for about 10 years, or until the majority of the larger timber has been salvaged. From Lander Slope, approximately 10 MMBF would be offered in a large sale, which would take up to 5 years to harvest. After completion of this sale, logging activity would cease for about 10 years, then another sale could be offered. The primary objective of the harvesting program would be to achieve management of the timber resources by salvaging the dead and dying timber and regenerating the harvested areas. However, other resource objectives, such as wildlife, would be integrated into management plans to enhance these other values.

This would not be a sustained-yield harvest, but would be a salvage of the dead and dying timber and would eventually create an uneven-aged forest which would have many benefits, including enhancement of wildlife habitat.

Prescribed burning techniques would be included in management plans for conifer and aspen stands to achieve multiple resource objectives. Standard and special provisions would be employed on all sales and burns to achieve management objectives. Clearcuts, in all cases, would be limited to 25 acres and the size of prescribed burns would be determined on an individual project basis. Regeneration of all harvested and burned areas would be assured, either through natural or artificial regeneration.

Forest-cultural practices in timber stands would be undertaken as needed, depending on funding, to assure optimum growth conditions in all stands.

Landownership Adjustments and Utility Systems

The Preferred Alternative is to retain the majority of the 2.5 million acres of public lands in federal ownership. One hundred seventy-two tracts, encompassing approximately 24,700 acres, meet the basic criteria for disposal pursuant to the Federal Land Policy and Management Act of 1976. Following more detailed analysis, it appears that 108 of these tracts, encompassing approximately 12,500 acres, could be considered for future disposal through either sale or exchange (see map

5-4). The other 64, encompassing approximately 11,500 acres, would be retained in public ownership.

Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

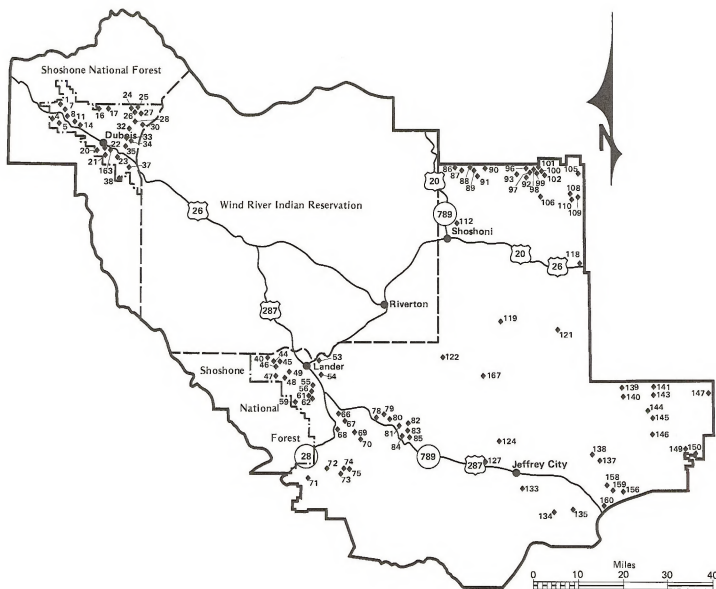
Leases and disposals would continue to be used to meet the needs of local and state governments.

Major utility and transportation systems would be located to make use of existing corridors whenever possible, to provide for cost-efficient routes, and to provide for protection of other resource values such as scenery and wildlife. Most of the area would be open for location of major utility systems. However, areas with the most potential conflicts have already been identified as areas to avoid. The avoidance areas would be areas where rights-of-way may be granted only when no feasible alternative route or designated rights-of-way corridor is available. These areas include the Whiskey Mountain Bighorn Sheep Winter Range, the East Fork Crucial Elk Winter Range, the Dubois Badlands, the Lander Slope, Red Canyon, South Pass, Sweetwater Canyon, the Sweetwater Rocks, and ¼ mile or the visible horizon, whichever is less, on each side of the Oregon/Mormon Pioneer National Historic Trails (see map 5-5).

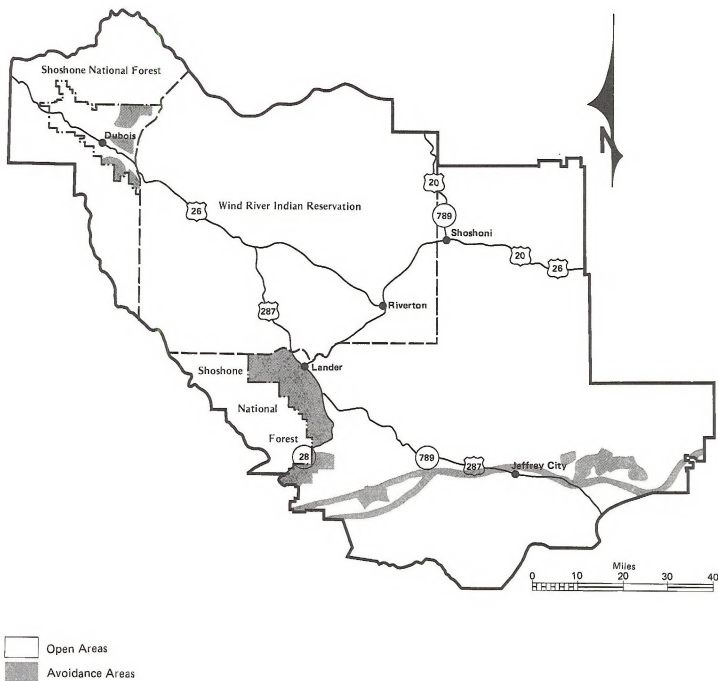
Recreation Management

The Preferred Alternative would provide for management and maintenance of seven existing recreational sites, including Atlantic City, Big Atlantic Gulch and Cottonwood campgrounds; Split Rock and Devil's Gate interpretive sites; and Wild Horse Point Overlook and Castle Gardens picnic areas. The Split Rock and Devil's Gate interpretive sites are included in the Oregon/Mormon Pioneer National Historic Recreation Area Management Plan.

An interpretive marker would be added for the Red Canyon National Natural Landmark overlook. Hazard reductions would be implemented and maintained on Green Mountain and South Pass. Plans for resource protection and maintenance of dispersed recreational opportunities and settings in the South Pass Historic Mining Area would be provided in a recreation management plan.



Map 5-4
Potential Sale of Exchange Tracts
Lander Resource Area



Map 5-5
Major Utility Systems
Lander Resource Area

PREFERRED ALTERNATIVE

The Lander Resource Area staff would continue to monitor recreational use throughout the resource area. Area personnel would supervise recreational use and provide enforcement of recreation-oriented regulations and special designations. Monitoring and use supervision would be accomplished by patrolling high-use areas and contacting users in the field. Special efforts would be made to ensure compliance with the terms of special recreation use permits, authorizing commercial guide/outfitter services, permits for tours of the Oregon/Mormon Pioneer National Historic Trails, and special designations dealing with recreation such as a 14-day camping limit on public lands and off-road vehicle designations. Quotas would be established for commercial hunting camps in the Green Mountain, Lander Slope, Red Canyon, and Whiskey Mountain Management Units.

Winter sports would be restricted in the Red Canyon elk winter range area.

Off-Road Vehicles (ORVs)

The Preferred Alternative for ORV management is to provide for the continuation of existing ORV designations completed in 1981 on about one-half of the resource area. It would also provide for designations to be completed on the remaining areas of public lands. ORV management would focus more intensive management on those management units having crucial wildlife values, significant visual resources, high watershed sensitivity and outstanding natural character. Intensive management would limit ORV use to designated roads and vehicle routes and impose seasonal closures (from approximately December through June) on areas or roads where vehicle use is totally incompatible with other resource values. ORV use in the remainder of the resource area would be limited to existing roads and vehicle routes, except for the performance of necessary tasks (i.e., work requiring the use of a motor vehicle. Examples include picking up big game kills, repairing range improvements, managing livestock, mineral activities where surface disturbance does not total more than 5 acres as described in the "5-acre exemption" under the 43 CFR 3809 regulations, etc.). ORV designations are summarized in table 5-1 (see map 5-6).

Cultural/Natural History

The various management actions chosen from the alternatives to make up the Preferred Alternative are generally oriented toward protection and maintenance of the significant cultural resources located in the Lander Resource Area. The significant resources listed in several management units, including the Oregon/Mormon Pioneer Trail; the South Pass Historic mining area; Castle Gardens; Beaver Rim Proposed National Natural Landmark; the Red Canyon National Natural Landmark; and the Warm Springs Canyon flume, natural bridge and geyser, have been selected for enhanced protection. The significant resources listed in the remaining management units, including the Sparhawk Cabin Site, and the Aspen Grove Site need no further management at this time; therefore, no special cultural resource management actions have been proposed.

Fire Management

The Preferred Alternative for approximately 2 percent of BLM administered lands is full suppression, with no equipment restrictions (see map 5-7). This would have the objective of suppressing all wildfires as quickly as possible with all available resources.

The areas for full suppression are areas with large amounts of intermingled or adjacent private and state lands and they contain either high historical or man-made values or very high wildlife habitat values. The values that could potentially be destroyed by uncontrolled wildfire far outweigh the damages that could occur from fire-fighting activities. For these reasons, wildfires in these areas should be suppressed as quickly as possible.

The Preferred Alternative for approximately 60 percent of the lands is full suppression of wildfires with limited or restricted use of heavy equipment. This does not preclude the use of heavy equipment, such as bulldozers, but does limit their use on initial attack and requires fire authorities to analyze a fire situation critically before committing heavy equipment to a fire.

This alternative was chosen for some of the more critical areas in terms of resources such as

PREFERRED ALTERNATIVE

TABLE 5-1
OFF-ROAD VEHICLE DESIGNATIONS

Designation	Area	Approximate Acreage
Limited to designated roads and vehicle routes	Lander Slope/ Red Canyon	40,000 acres
Limited to designated roads and vehicle routes	Green Mountain	56,000 acres
Limited to designated roads and vehicle routes	Whiskey Mountain	4,500 acres
Closed	Castle Gardens	80 acres
Closed	Dubois Badlands	4,500 acres
Limited to existing roads and vehicle routes	All other public land in Lander Resource Area	2,400,000 acres

visual, wildlife habitat, soils, timber, and recreation. There are many man-made improvements in these areas and large areas of intermingled private and state lands. Because these improvements and other lands could be severely damaged by uncontrolled fires, fires should be suppressed as quickly as possible. However, the inherent values in the area could be damaged beyond immediate repair through the uncontrolled use of heavy ground equipment in the fire-fighting operations; therefore, limitations would be put on the use of heavy equipment.

The Preferred Alternative for approximately 38 percent of the public lands in the resource area is limited suppression of wildfires. Under this alternative there would be no initial attack on the fire and an observer would monitor a wildfire to ensure management objectives were being met. Suppression of a wildfire would occur when the fire 1) exceeds or has the potential to exceed the size specified in a predetermined plan, 2) threatens private property, 3) threatens other man-made structures, or 4) threatens human life.

The areas chosen for this alternative are generally more remote areas with few man-made improvements and small amounts of intermingled private and state lands. Wildfires would have little potential for damaging improvements or other lands; therefore, the cost of suppression activities cannot be justified. Prescribed burns would be allowed in all management units.

Access

The Preferred Alternative, which balances access needs with existing access, is to provide the most realistic overall transportation plan. Under this alternative, unneeded access roads would be rehabilitated, as outlined in the plan and funded by the benefitting activity. BLM access easement negotiations with landowners would be proposed for areas where public or administrative access would be needed. Current and proposed BLM road easements are delineated on table 5-2 and map 5-8.

Soil, Water and Air Management

Soil, water and air management were not considered as separate resource programs or issues in the alternatives and analyses, but were considered in each of the resource programs analyzed to assure management actions meet basic objectives. The objective is to manage the public lands in a manner that will protect and improve the quality of the soil, water and air resources associated with the public lands.

PREFERRED ALTERNATIVE

TABLE 5-2
ACCESS

Existing Easements		Easements Proposed for Negotiation	
Maintenance Standard*	Road Name	Maintenance Standard*	Road Name
4	Ft. Stambaugh Loop	1	Beaver Rim 2401
2	Hudson-Atlantic City 2302	3	Crooks Mountain 2409
2	Three Forks-Atlantic City 2317	1	Mormon Basin 2202
3	Green Mountain Loop 2411	1	Government Draw 2304
2	Cedar Rim 2301	2	Signor Ridge
2	Agate Flats 2404	4	Taggart Meadows
2	Castle Gardens 2107	2	Hudson Atlantic City 2302
2	Cyclone Rim 3216	2	Copper Mountain 2113
2	Red Creek 3219	2	Willow Creek 2412
2	Bison Basin-Hadsell Crossing	1	Beef Gap
2	Copper Mountain 2113	1	Wolf Gap
1	Oil Springs 2305	2	East Beaver
		1	Tappan Creek
		1	Dillabaugh Butte 2315

*Maintenance standards are based on need and may be modified as needs change. They are:

- 1 = primitive road, minimal intermittent maintenance.
- 2 = single lane bladed, intermittent regular maintenance.
- 3 = graded, double lane ditched, regular maintenance.
- 4 = graded, double lane ditched, regular maintenance, graveled.

Livestock Grazing

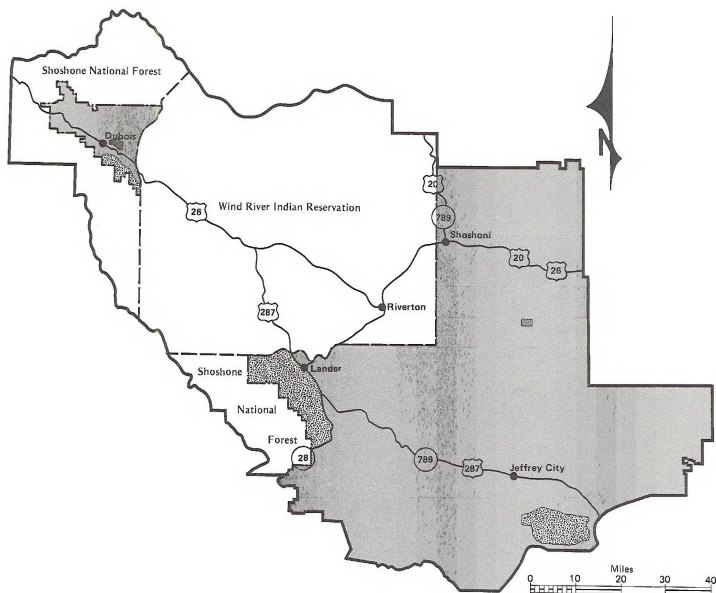
Grazing allotments have been grouped into three categories: M (maintain), C (custodial) and I (improve). For each category, recommendations are made for an intensity of grazing management, including multiple-use resource management objectives, range improvement and monitoring needs, and actions needed to improve and maintain rangeland condition and productivity (see Livestock Grazing Supplement). Under the Preferred Alternative, present management would continue until monitoring results were available. Management actions based on all available data would then be implemented on the allotments, beginning with those needing the most improvement.

There are 291 allotments in the Lander Resource Area. Category M allotments comprise 29 percent of the allotments and 28 percent of the acreage in the resource area. The principal objective for these allotments is to maintain or improve their present satisfactory resource condition and allotment management. Category C allotments comprise 28 percent of the allotments and 5 percent of the acreage in the resource area. The principal short-term objective on these allotments is to prevent deterioration of the current resource

conditions by managing the lands in a custodial manner. Category I allotments comprise 43 percent of the allotments and 67 percent of the acreage in the resource area. The principal objective for management of Category I allotments is to improve existing resource conditions and reduce or eliminate conflicts. Specific management actions proposed for these allotments depend upon the specific problems affecting each allotment (refer to Grazing Supplement and Green Mountain EIS).

Green Mountain Study Area

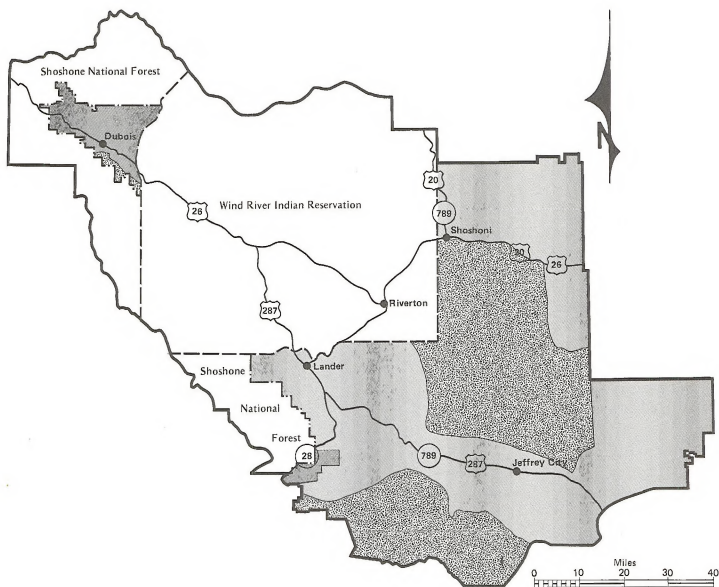
In the rangeland management section of the Green Mountain Management Framework Plan, the grazing allotments were grouped into categories, and for each category recommendations were made for an intensity of grazing management, including: specific multiple-use resource management objectives; range improvement and monitoring needs; and actions needed to improve and maintain rangeland condition and productivity. Tradeoffs considered in arriving at the recommendations were identified in the analysis found in the MFP. Under the proposed action, present management continues until monitoring results are available. Management



-  Existing Roads and Trails
-  Designated Roads and Trails
(Green Mountain, Lander Slope, Whiskey Mountain)
-  Closed (Castle Gardens; Dubois Badlands)

Note: Red Canyon Elk Winter Range is closed to over Snow Vehicles.

Map 5-6
ORV Designations
Lander Resource Area



Map 5-7
Fire Management Plan
Lander Resource Area



Existing Access Easements

- A Fort Stambaugh Loop 2324
- B Hudson-Atlantic City 2302
- C Three Forks-Atlantic City 2317
- D Green Mountain Loop 2411
- E Cedar Rim 2301
- F Agate Flats 2404
- G Castle Gardens 2107
- H Cyclone Ridge 3216
- I Red Creek 3219
- J Bison Basin-Hadsell Crossing 3221
- K Copper Mountain 2113
- L Oil Springs 2305

County Roads

Map 5-8
Access
Lander Resource Area

PREFERRED ALTERNATIVE

actions based on all available data would then be implemented.

Category M allotments comprise 21 percent of the allotments and 6 percent of the acreage in the study area. The principal objective for these allotments is to maintain or improve their presently satisfactory resource condition and allotment management. Category C allotments comprise 25 percent of the allotments and 1 percent of the acreage in the study area. The principal short-term objective on these allotments is to prevent deterioration of the current resource conditions by managing the lands in a custodial manner. Category I allotments comprise 54 percent of the allotments and 93 percent of the acreage in the study area. The principal objective for management of category I allotments is to improve existing resource conditions and reduce or eliminate conflicts. Specific management actions proposed for these allotments depend on the specific problems affecting each allotment.

Under the elimination of livestock grazing alternative, livestock grazing would be eliminated from the public lands in the Green Mountain study area, and the lands would be managed for other resource values. Wild horse populations would be allowed to increase, and all managed wildlife species would be allowed to increase to population levels identified in the Wyoming Game and Fish Department's Strategic Plan for Comprehensive Management of Wildlife in Wyoming.

Under the enhanced livestock grazing alternative, forage available for domestic livestock use would be increased through an accelerated program of range improvements. Suitable allotments would be placed under allotment management plans (AMPs), and livestock would have priority in forage allowances.

Under the no action alternative, the existing range management program would be frozen. There would be no new range improvement projects, but maintenance of existing improvements would be allowed. Livestock management actions such as changes in seasons-of-use, kind of livestock, etc., would not be allowed, regardless of need. Wild horse and wildlife numbers would be maintained at current levels through wild horse gathering operations and coordination with the Wyoming Game and Fish Department.

Under the management based on currently available forage data alternative, currently available forage data would be used, in lieu of monitoring, to establish grazing capacities. Maintenance and construction of range improvements would continue as planned. Plans for

livestock and wild horse adjustments would begin immediately. Other management actions would be the same as for the Proposed Action.

The Proposed Action is the Preferred Alternative. The proposed rangeland management for the study area was formulated through the BLM planning system, specifically the Green Mountain MFP. Resource problems and possible solutions were identified and analyzed to determine effects on other resources. The resulting multiple-use MFP recommendations were the basis for the proposed action (refer to Green Mountain Grazing EIS).

Gas Hills Study Area

The Preferred Alternative was selected over the other alternatives (described in the Gas Hills Grazing EIS Supplement) because it includes the management actions and rangeland improvements needed to improve conditions in those allotments where there is a need and potential for improvement. It also provides for maintenance of present satisfactory conditions and management in the other allotments.

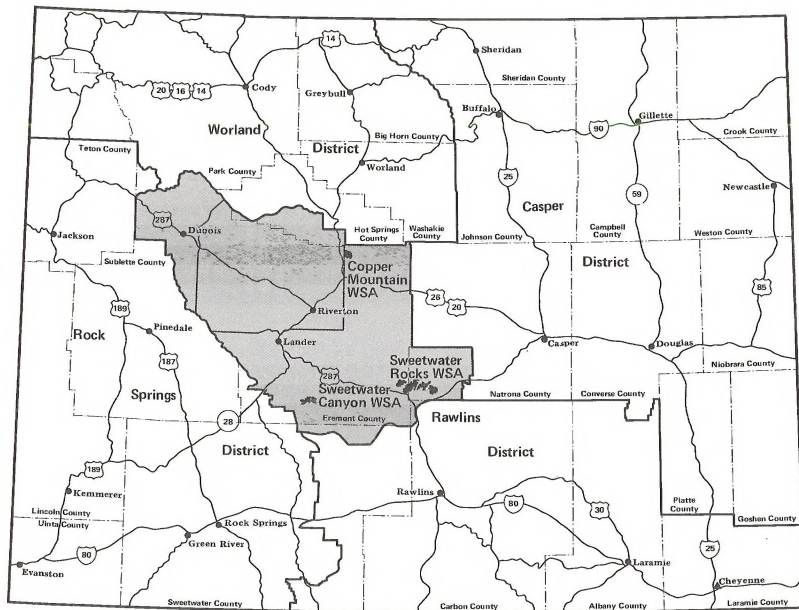
Specifically, it was selected over the continuation of present management alternatives because present management does not address the monitoring and management needs for those allotments where improvement is necessary.

Wilderness

Three management units in the Lander Resource Area are wilderness study areas (WSAs). These units, which encompass 6 WSAs totalling 48,000 acres, are Sweetwater Canyon, Sweetwater Rocks (4 units), and Copper Mountain (see map 5-9). Please refer to the Wilderness EIS for the detailed description and analysis.

Areas of Critical Environmental Concern

The Federal Land Policy and Management Act (FLPMA) of 1976 mandates that priority be given to specific areas for designation and protection to prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes,



Map 5-9
General Location-Wilderness Study Areas
Lander Resource Area

PREFERRED ALTERNATIVE

or to protect life and provide safety from natural hazards. To protect these significant surface values, the Preferred Alternative would result in an ACEC designation on approximately 117,000 acres representing about 4.7 percent of the Lander Resource Area and would require intensive management of all surface-disturbing activities. The following areas would be designated ACEC: portions of the Lander Slope Management Unit (approximately 25,000 acres of federal surface, see map 5-17), Red Canyon Management Unit (approximately 15,000 acres of federal surface, see map 5-18), Whiskey Mountain Management Unit (approximately 4,000 acres of federal surface, see map 5-34), East Fork Management Unit (approximately 1,000 acres of federal surface, see map 5-28), and Dubois Badlands Management Unit (approximately 5,000 acres of federal surface, see map 5-31); the major portion of the South Pass Management Unit (approximately 12,000 acres of federal surface, see map 5-19) (the proposed Historic Mining District); and small portions of the Green Mountain Management Unit (approximately 18,000 acres of federal surface, see map 5-12) and Beaver Creek Management Unit (approximately 7,000 acres of federal surface, see map 5-15) (Beaver Rim). In addition, significant sites and segments along the Oregon/Mormon Pioneer Trail (e.g., ruts, swales, graves, campsites, pristine settings, etc.) would be designated as ACEC and are located within the Beaver Creek (see map 5-15 for the federal surface affected by this designation) and Gas Hills (see map 5-24 for the federal surface affected by this designation) Management Units. The most important parts of the Trail, which involves the Lander Resource Area, lie between Independence Rock and Farson. For the general location of these ACECs, see map 2-1.

THE PREFERRED ALTERNATIVE AND RATIONALE BY MANAGEMENT UNIT

When combined with Management Actions Common to All Alternatives (Chapter II), this constitutes our Preferred Alternative.

Introduction and Background

Early in the process, guidance was established to provide for identification of resource management units and management actions for each unit (see Appendix 1 for maps of each management unit). The Lander Resource Area has 13 such units that were delineated based on resource values, competing land uses, and areas that provide specific opportunities and needs for management actions (see map 2-1). Alternatives were then formulated to resolve these issues and management needs for each unit. The 13 management units are: Green Mountain, Beaver Creek, Lander Slope, Red Canyon, South Pass, Gas Hills, East Fork, Dubois Badlands, Whiskey Mountain, Dubois Area, Sweetwater Canyon (WSA), Sweetwater Rocks (WSA), and Copper Mountain (WSA).

Please note that the planned management actions for each of the 13 areas will focus mainly on the resource values present and the Preferred Alternative for each resource program in that unit.

The planned management actions define the types of land use that would occur in each management unit as a result of the Preferred Alternative. Where dominant resource values are not present, the prescription will focus on major or priority management actions that would be carried out to improve, sustain or protect resources in the unit. This process affords detailed direction to specific geographic units and provides a clear picture of what resource values and BLM program actions would be initiated to manage resources over a 10-year period. It will also serve as an important budgeting tool, because work force requirements and materials can be budgeted systematically to carry out planned actions.

Green Mountain Management Unit

The Green Mountain Management Unit contains about 126,000 acres of BLM-administered surface, 149,000 acres of federal mineral estate, and 36,000 acres of state and private lands.

The Green Mountain area encompasses some of the most diverse and intensive uses of resources within the resource area. It is the site of extensive

PREFERRED ALTERNATIVE

uranium exploration, mining, oil and gas activity, and contains substantial commercial-grade timber stands that are being harvested. It also contains important wildlife habitat values. Green Mountain is a popular and well-used recreational area enjoyed by hunters, anglers, off-road vehicle enthusiasts, snowmobilers, campers, hikers, and other outdoorsmen. It is also used by livestock operators for cattle grazing, and it is part of the area used as range by wild horses.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the Green Mountain Management Unit is to keep the entire unit open for oil and gas leasing with some no-surface-occupancy restrictions (see map 5-10). New oil and gas leases issued in areas rated as having moderate, low or no potential for the occurrence of oil and gas reserves would include a no-surface-occupancy restriction to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, significant cultural sites, elk crucial winter range, and the campground and picnic site on Green Mountain. In addition, seasonal restrictions would be applied to the leases to protect important wildlife habitat areas. In areas with moderate, low or no potential for occurrence of oil or gas, restrictions would be applied automatically prior to lease issuance. These restrictions could be waived later if appropriate. In areas with high-potential for the occurrence of oil or gas including KGSSs, restrictions would not be automatically applied prior to lease issuances. Instead, new oil and gas leases in these areas would be conditioned with no-surface-occupancy and seasonal restrictions only when necessary to avoid a significant adverse impact on another resource. This alternative would further provide for the enhancement of oil and gas development in KGSSs and high-potential areas through the waiver of lease restrictions on demonstration by the lessee that adverse impacts to other resources could be acceptably mitigated.

Implementation of the Preferred Alternative would allow for maximum management flexibility over the full range of resources. In areas of moderate, low and no potential for occurrence of oil and gas, this alternative allows for enhanced management of the surface resources, while providing opportunities for exploration and development of the oil and gas reserves. Conversely, in areas of high potential for the occurrence of oil and gas or in areas of established

production such as KGSSs, this alternative allows for enhanced management of exploration and development activities by minimizing the restrictions imposed on these activities.

Locatable Minerals

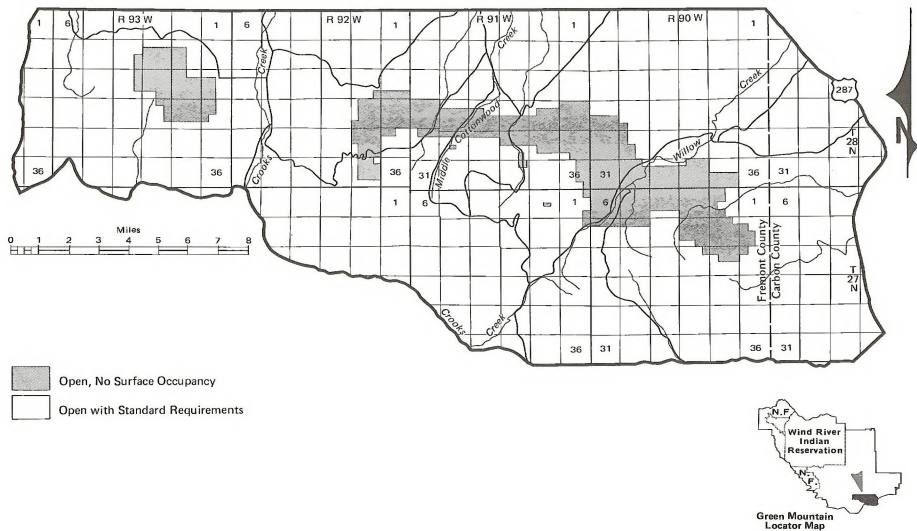
The Green Mountain Management Unit would be open for locatable mineral exploration and development, except for 120 acres around the BLM and county campgrounds and picnic sites on Green Mountain, which are presently segregated from appropriation under the mining laws. In addition, a plan of operations would be required for all locatable mineral exploration and development activity within 350 feet of the Sparhawk Cabin and on the crucial elk winter range. These areas would be designated as an ACEC (see map 5-11 for the federal surface affected by this designation).

The Preferred Alternative maintains opportunities for the exploration and development of locatable mineral resources. It restricts locatable mineral exploration and development on only a few sites where these activities could cause unacceptably high adverse impacts to other significant resource values.

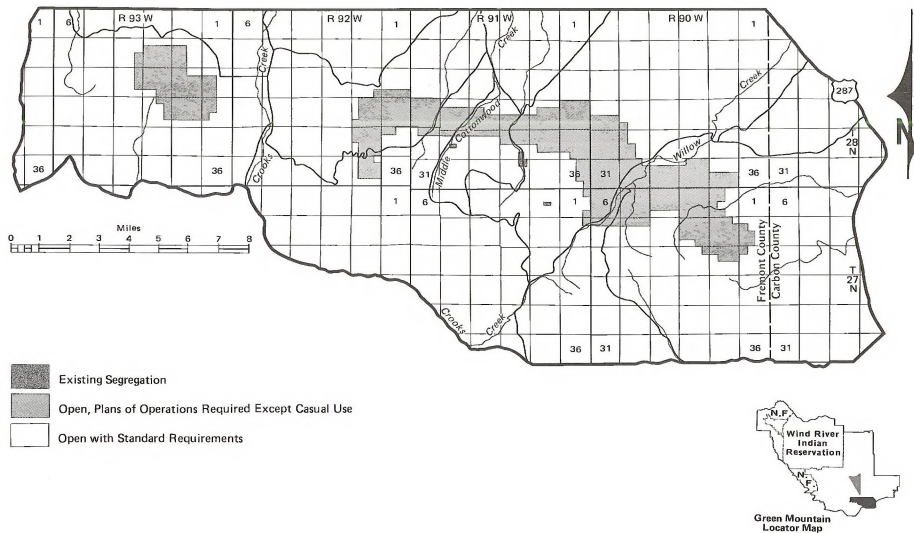
Fish and Wildlife

Under the Preferred Alternative, routine fish and wildlife habitat improvement projects and maintenance of existing projects would be completed after appropriate review and would be consistent with program capabilities and priorities. Prescribed burns and other cultural practices would be used to manipulate selected tree and shrub sites to improve habitat for elk, mule deer, beaver, fisheries, and a variety of other animal species. The Green Mountain Management Unit would be a moderate priority area for development of an aquatic habitat management plan for improvement of fisheries and riparian and beaver habitats. Major habitat improvement objectives for elk and mule deer would be incorporated into a comprehensive timber management plan and grazing allotment management or development plan.

This alternative was selected because it would provide reasonable ways to maintain and enhance the significant fish and wildlife resource values in the unit, based on the need to upgrade management of the timber resource and allow for continued development of the high-value uranium and oil and gas resources.



Map 5-10
Oil and Gas Leasing
Green Mountain



Map 5-11
Locatable Minerals
Green Mountain

PREFERRED ALTERNATIVE

Cultural practices designed to promote aspen and willow regeneration and create diversity in size, age-class, and edge-effect in conifer stands, while still maintaining elk cover requirements, would improve habitat for elk and mule deer. Improving the vigor of aspen and willow stands, expanding the size of stands or reestablishing stands would help stabilize the forage and material base to maintain beaver and their dam complexes. This, in turn, would benefit many other wildlife species by helping to raise water tables, stabilize stream flows and stabilize or expand riparian zones.

Forest Management

The Preferred Alternative for forest management in the Green Mountain Management Unit involves advertised or negotiated timber sales totalling approximately 2 MMBF (million board feet) per year to meet the demand for sawtimber products. Also, approximately 1.5 to 2.0 MMBF would be sold on a public demand basis to meet the demand for minor forest products (fuelwood, posts and poles and houselogs).

The entire mountain would be managed on a compartment basis, whereby the timber sales would be harvested from specific compartments on a rotation basis. The mountain has been divided into 17 compartments. Management activities would be conducted for 5 or 6 years in each compartment, and the operations would then be moved to the next compartment. After the sales have been terminated, efforts would be made to concentrate the majority of the public woodcutting in the compartments in which the advertised sales were being conducted. The efforts to restrict woodcutting to desired compartments would be mainly in the form of signs directing people to desired areas, and by restricting access to undesirable areas, either with gates or dirt berms. A temporary employee is assigned to the mountain in the summertime, including weekends, to monitor firewood cutting. Also, prescribed burns or other techniques would be applied to areas within each compartment, either at the same time sales were being conducted or immediately after sales have been terminated. This compartment plan is not designed to harvest timber on a sustained-yield basis, as a lot of the timber lands have already been out, and the beetle epidemic has destroyed most of the larger stands. Rather, it is designed to bring the harvest under a more organized system and eventually bring the mountain under intensive management.

At the proposed level of harvest, the sawtimber-sized timber would be depleted in approximately

7 to 10 years. However, at the present level of harvest (1 MMBF sawtimber and 1 MMBF other products per year), which could continue due to public demand, the depletion time could be lengthened to 15 or more years.

The management actions in adjacent compartments would be separated in time so that the forest would eventually progress to an uneven-aged condition. This would enhance the wildlife habitat by maintaining a continual supply of forage and also a continual supply of thermal and hiding cover for big-game animals. Within each compartment, a 40- to 60-percent cover to forage ratio will be maintained to the extent possible. This would also enhance the timber condition by removing the dead and dying mature and overmature stands and replacing them with vigorous new stands. The harvested stands would be separated enough so that the new stands, when mature, would make the forest less susceptible to another mountain pine beetle epidemic similar to the one that has recently occurred.

Most harvesting would utilize clearcuts up to 25 acres in size, which would be irregularly shaped to create more edge effect for wildlife and to enhance natural regeneration of harvested areas. Clearcuts would not be allowed within 100 feet of perennial streams to reduce disturbances to riparian habitats. To reduce erosion potential, no harvesting with conventional logging equipment (bulldozers or rubber-tired skidders) would be allowed on slopes over 45 percent.

If any harvesting in aspen stands were conducted, clearcut sizes would be determined on an individual project basis.

Harvested sites would be prepared for regeneration by piling and burning all unuseable wood and debris left after logging (slash). Natural regeneration has been very successful in the past. However, if it were unsuccessful in some areas, artificial regeneration (planting or direct seeding) would be employed.

Precommercial or commercial thinnings in younger stands would be employed as required.

Landownership Adjustments and Utility Systems

The Preferred Alternative is to consider two isolated tracts (134 and 135) totaling 166 acres for disposal through sale or exchange (see map 5-12). Parcel 134 has public access but parcel 135 does not. The rationale for disposal is that neither of the parcels contain known significant or unique



Map 5-12
Landownership Adjustments
Green Mountain

PREFERRED ALTERNATIVE

resource values. Therefore, any potential land-use change would not result in a significant-adverse impact.

Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

Recreation and Public Purpose (R&PP) Act leases and patents would be considered on a case-by-case basis. R&PP proposals would be analyzed to determine compatibility with the unit's resource values as applications were received from organizations and state and local governments.

Public lands would be open for location of utility and transportation systems. These systems would be concentrated in existing utility corridors whenever possible. No significant impacts are anticipated from major utility systems, especially if located in existing corridors.

Recreation Management

The Preferred Alternative is to maintain existing developments, establish a 14-day camping limit on all camping, eliminate safety hazards and improve aesthetic values. Quotas would be established for commercial hunting camps.

Generally, this unit would be managed as an extensive recreation management area where dispersed recreation would be encouraged and where visitors would have freedom of recreational choice with minimal regulatory constraint. Recreation management would emphasize the resolution of competing uses and provide resource protection. Thus, recreation management priorities include maintaining existing investments, reducing public safety hazards, enhancing aesthetic values, and establishing camping and commercial use quotas.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to continue the present ORV designations that limit ORV use to designated roads and vehicle routes and establish seasonal road closures on Green Mountain above 7,000 feet elevation. Long- and short-term resource damage, user access requirements, and public safety suggest that limitation of ORV use is in the best public interest. Several roads and vehicle routes would be closed seasonally in order

to protect the roadbed and surrounding watershed values (December 1 through June 15).

Fire Management

The Preferred Alternative, full suppression with limited or restricted use of heavy equipment, was chosen for this area. This would entail an aggressive initial attack with all available resources, with the exception of heavy equipment such as bulldozers. The objective would be to suppress wildfires as quickly as possible with as little surface disturbance as possible.

The Green Mountain Management Unit has a very high fire danger because of the recent mountain pine beetle epidemic, which killed the majority of the larger trees. The area has a history of two lightning fires every year, and there are many man-made structures on the mountain, such as telephone and television relay stations, and exploratory drilling rigs during the summer and fall. There is also a very high use of the area for woodcutting and general recreation.

Wildfires probably could not be managed or controlled on Green Mountain and might cause more harm than good. However, fires in the area could play a very beneficial role in wildlife habitat and timber stand enhancement. It would be much safer, though, and objectives could be more fully met, by utilizing prescribed burns.

Because of the potential erosion problems on steep slopes, heavy equipment should be limited and used only when absolutely necessary. Uncontrolled use of heavy equipment during a previous fire on the Green Mountain Management Unit resulted in unnecessary surface disturbance.

Access

The Preferred Alternative is to provide public access to public lands for forest, wildlife, recreation and livestock grazing management. Existing BLM roads and easements would be maintained, and BLM would negotiate additional easements or initiate appropriate route alternatives to secure public access as identified in the District Transportation Plan. As of 1985, the plan calls for negotiating easements on the Willow Creek Road (via the Cooper Creek Road), the Crooks Mountain Road and the Taggart Meadows Road.

Unnecessary roads, such as the Cooper Creek fire access road, would be obliterated and

PREFERRED ALTERNATIVE

rehabilitated, thus restoring the natural landscape to some extent.

Beaver Creek Management Unit

The Beaver Creek management unit contains about 1,165,000 acres of BLM-administered surface, 1,370,000 acres of federal mineral estate, and 323,000 acres of state and private lands.

The Beaver Creek Management Unit has important uranium and oil and gas resources. It is extensively used for livestock grazing and contains valuable wildlife habitat. Several nationally significant cultural and historical sites, such as the Oregon/Mormon Pioneer Trail and the Split Rock landmark are located within this unit.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the Beaver Creek Management Unit is to keep the entire unit open for oil and gas leasing. Oil and gas leases issued in areas rated as having moderate, low or no potential for the occurrence of oil and gas reserves would include a no-surface-occupancy restriction to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, significant cultural sites, Jeffrey City, the Jeffrey City airport, Beaver Rim (starting at U.S. Highway 287 and extending north 8 miles), the proposed Ice Slough National Register Site, Split Rock Landmark, Split Rock Interpretive Site, all of the Rocky Ridge Site, the Aspen Grove Site, and additional acreage and portions of the Oregon/Mormon Pioneer National Historic Trails (see map 5-13). In addition, seasonal restrictions would be applied to the leases to protect important wildlife habitat areas. In areas with moderate, low or no potential for occurrence of oil or gas, restrictions would be applied automatically before lease issuance. These restrictions could be waived later if appropriate. In areas with high potential for the occurrence of oil or gas, including KGSSs, restrictions would not be automatically applied before lease issuance. Instead, new oil and gas leases in these areas would be conditioned with no-surface-occupancy and seasonal restrictions only when necessary to avoid a significant adverse




impact on another resource. This alternative would further provide for the enhancement of oil and gas development in KGSSs and high-potential areas through the waiver of lease restrictions when the lessee has demonstrated that adverse impacts to other resources could be acceptably mitigated.

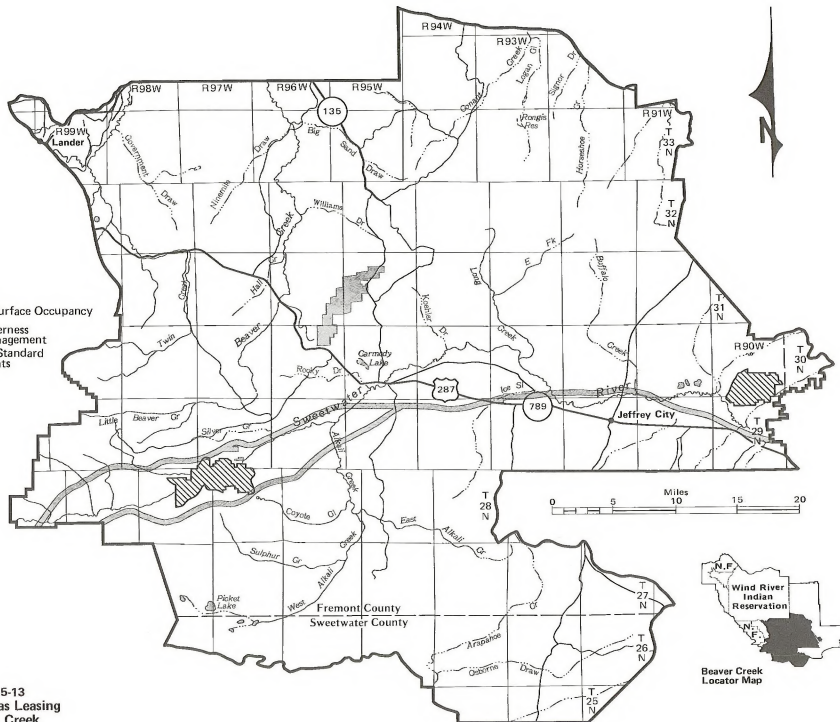
Implementation of the Preferred Alternative would allow for maximum management flexibility over the full range of resources. In areas of moderate, low and no potential for occurrence of oil and gas, this alternative would allow for enhanced management of the surface resources, while providing opportunities for exploration and development of the oil and gas reserves. Conversely, in areas of high potential for the occurrence of oil and gas or in areas of established production such as KGSSs, this alternative would allow for enhanced management of exploration and development activities by minimizing the restrictions imposed on these activities.

Locatable Minerals

The Beaver Creek Management Unit would be open for locatable mineral exploration and development, except for 1,710 acres around the Split Rock Landmark, Rocky Ridge, the Split Rock Interpretive Site, and the Aspen Grove Site, areas withdrawn from appropriation under the mining laws, and an additional 280 acres proposed to be withdrawn from appropriations under the mining laws around Rocky Ridge (see map 5-14). A plan of operations would be required for all locatable mineral exploration and development activity (except casual use) within $\frac{1}{2}$ mile of the Gillespie Place Historic Site and Willies Handcart Commemorative Site, Beaver Rim (starting at U.S. Highway 287 and extending north 8 miles), and the Ice Slough proposed National Register Site. A plan of operations would also be required for all locatable mineral exploration and development activities on significant sites and segments along the Oregon/Mormon Pioneer Trail (e.g., ruts, swales, graves, campsites, pristine settings, etc.). All areas requiring a plan of operation would be designated as ACECs. See map 5-14 for the federal surface affected by this designation.





The Preferred Alternative would place restrictions on locatable mineral exploration and development only in areas where these activities could cause significant adverse impacts to other significant resource values. This alternative provides for maximum opportunities for the exploration and development of the locatable mineral resources.

-  Open, No Surface Occupancy
-  Under Wilderness Interim Management
-  Open with Standard Requirements



Beaver Creek
Locator Map

Map 5-13
Oil and Gas Leasing
Beaver Creek

-  Existing Withdrawal
-  Open, Plans of Operations
Required Except Casual Use
-  Under Wilderness
Interim Management
-  Open with Standard
Requirements



Map 5-14
Locatable Minerals
Beaver Creek

PREFERRED ALTERNATIVE

Phosphates

The Preferred Alternative for management of the Beaver Creek Management Unit is to keep the unit open for exploration and development of the phosphate resources within the unit. All exploration permits and leases issued within the unit would include a no-surface-occupancy restriction, when needed, to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, important scenic areas, and significant cultural sites. In addition, seasonal restrictions would be applied to the prospecting and exploration as needed to protect crucial wildlife habitat areas (see Appendix 2).

The Preferred Alternative would provide for the protection of sensitive surface resources, while providing for opportunities to explore and develop the phosphate reserves within the management unit.

Fish and Wildlife

The Preferred Alternative would provide for development of routine fish and wildlife habitat improvement projects and maintenance of existing projects after appropriate review and where consistent with program capabilities and priorities. Special management actions and projects to improve fisheries and associated riparian habitats in the upper Sweetwater River and Beaver Creek drainages would also be undertaken. They would be included as objectives in a fisheries and riparian habitat-oriented, habitat management plan.

This alternative was selected because it provides for a concerted effort to address the problems of damaged and deteriorating fisheries and associated riparian habitats. The upper Sweetwater River and Beaver Creek drainages have the most extensive public land stream fisheries and stream-associated aquatic-riparian habitat base in the resource area. This area of high fisheries/riparian value overlaps the southwest part of the Beaver Creek Management Unit and the South Pass Management Unit. The fisheries and riparian habitats are mostly associated with small streams, commonly with aspen/willow and beaver pond complexes. There is high demand for the fishing opportunities in the area from local and regional outdoor recreationists attracted to the general South Pass historical area. The riparian habitats here also provide crucial winter habitat for Shiras moose and important habitat for fawning mule deer and many other animals.

Many of the important riparian-aquatic habitat values have been seriously damaged or lost as a result of mining activities and many years of excessive grazing pressure on stream bottoms. There is a relatively high potential for significantly improving fish and wildlife habitat, increasing recreational opportunities (fishing, hunting) and reducing further fish and wildlife resource losses under the Preferred Alternative.

Rare Plants and Unique Plant Communities

Under the Preferred Alternative, a management plan would be developed to identify, protect, and maintain the habitat and population of rare plants and the Beaver Rim cushion plant and *Pinus flexilis*/*Agropyron spicatum* communities within the Beaver Creek Management Unit.

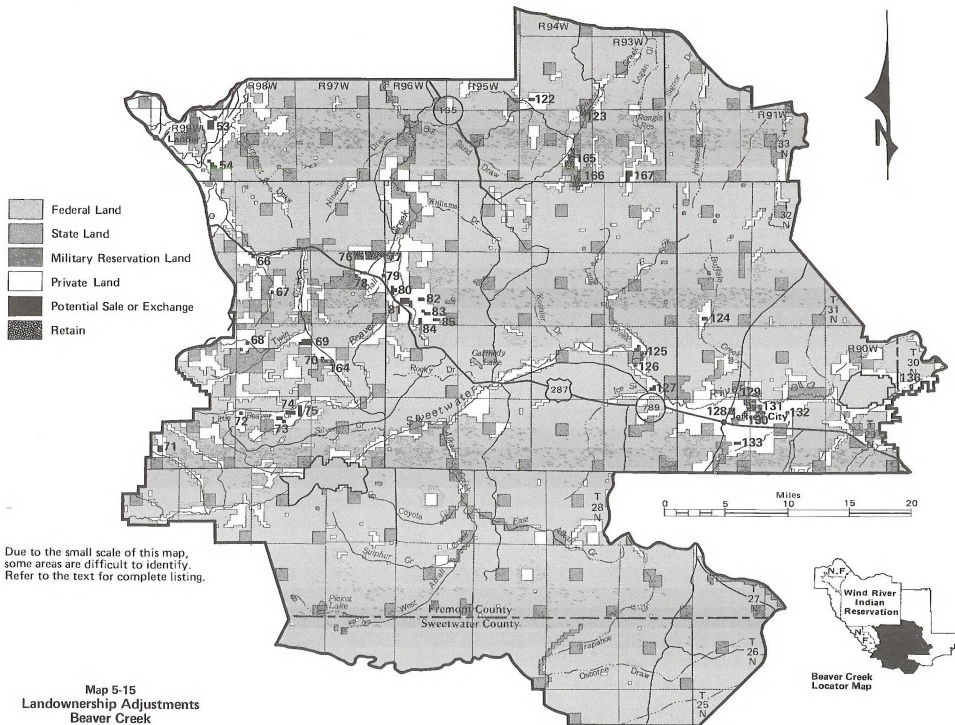
Landownership Adjustments and Utility Systems

The Preferred Alternative is to retain 16 isolated tracts and consider disposal of 25 isolated tracts through sale or exchange (see map 5-15).

Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

The 16 tracts (3,300 acres) to be retained are a portion of tract 68 (SE¼NE¼, NE¼NW¼ of section 18, T. 30 N., R. 98 W), tracts 76, 77, a portion of tract 78 (SW¼SE¼ of section 10, T. 31 N., R. 97 W), and tracts 123, 125, 126, 128, 129, 130, 131, 132, 136, 164, 165, and 166. The rationale for retaining these tracts varies. Some of the tracts are in the proximity of the Sweetwater River bottom and the associated riparian areas and provide a diversity of species habitat for wildlife. Other tracts have high-public values associated with the Oregon/Mormon Pioneer Trail. The remainder of the tracts have high-public recreational values because of legal access. In determining public access, it is assumed that state of Wyoming lands provide access to public lands managed by BLM.

The 25 tracts (3,158 acres) that could be considered for sale or exchange are tracts 53, 54, 66, 67, a portion of tract 68 (NE¼SE¼ of section 7, T. 30 N., R. 98 W), tracts 69, 70, 71, 72, 73, 74, 75, a portion of tract 78 (N¼SW¼ of section



PREFERRED ALTERNATIVE

11, T. 31 N., R. 97 W), and tracts 79, 80, 81, 82, 83, 84, 85, 122, 124, 127, 133, and 167. These tracts are small, generally do not have legal access, do not have unique or significant resources, and would probably not result in a change of land use if sold or exchanged.

Also, part of the Preferred Alternative is that Recreation and Public Purpose (R&PP) Act leases and patents would be issued on a case-by-case basis. The rationale for this alternative is that R&PP actions would be analyzed in response to R&PP applications, and decisions as to compatibility with the unit's resource values would be considered at that time.

Except for three areas (the Oregon/Mormon Pioneer Trail corridor, the Sweetwater Canyon and the Sweetwater Rocks), the Preferred Alternative would allow construction of major utility systems throughout the Beaver Creek Management Unit. Rights-of-way might be granted within the three high-resource value areas mentioned above if no feasible alternative route or designated corridor were available. Utility systems would be concentrated in existing corridors whenever possible. The rationale for this alternative is that there would be no significant impacts resulting from construction of major utility systems, except in the three high-resource value avoidance areas.

Recreation Management

The Preferred Alternative is to maintain the existing Split Rock interpretive site. The Split Rock interpretive site is incorporated in the management plan for the Oregon/Mormon Pioneer Trail, which provides detailed planning with specific objectives for use by visitors, resource protection, and interpretive needs consistent with public demand. The rest of the unit is part of an extensive recreation management area where dispersed recreation would be encouraged. Recreation management and maintenance would be minimal, with emphasis on the resolution of user conflicts and provide resource protection.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to continue the present ORV designations, which limit ORV use to existing roads and vehicle routes. This designation is determined to be appropriate for the majority of the public lands by accommodating access needs, while providing resource protection by limiting ORV use to existing roads and trails.

Cultural/Natural History

The Preferred Alternative for the cultural/natural history program in the Beaver Creek Management Unit would affect two cultural resources and one important natural history resource. It would ensure that all actions are consistent with the Oregon/Mormon Pioneer National Historic Trail Management Plan, it would encourage active negotiations to acquire the Burnt Ranch Historic site (an Oregon/Mormon Pioneer Trail site), and it would encourage National Natural Landmark designation and enrollment of the Beaver Rim proposed National Natural Landmark area.

The Oregon/Mormon Pioneer Trail Management Plan (described in chapter II) would establish protection, use and management guidelines for public land trail resources throughout the state of Wyoming, including the Lander Resource Area. Recommendations now formulated for the trail would establish the following in the Beaver Creek Management Unit: a $\frac{1}{4}$ mile or visible horizon corridor (whichever is closer) on each side of selected trail segments, where modern intrusions and disturbances would be minimized or prohibited; protection for the remainder of the Rocky Ridge site, Ice Spring Slough, Gilesple Place, Willies Handcart site, and a continuation of the protective withdrawals at the Aspen Grove Campsite, part of Rocky Ridge, the Split Rock Interpretive Site, and the Split Rock Historic Landmark. Adoption of these recommendations would provide continued protection of this National Historic Trail and several of its highly important sites. This type of management would ensure compliance with National Trails System Act requirements for the protection of important trail segments and sites, as well as provide for the preservation of several National Register listed and eligible trail properties. It would also continue longstanding efforts of BLM to protect and encourage public enjoyment of the trail.

Encouragement of negotiations to acquire the privately owned Burnt Ranch site could result in the transfer of a highly important Oregon/Mormon Pioneer Trail site into public ownership. This National Register eligible site could compliment the Oregon/Mormon Pioneer Trail resources of the Lander Resource Area by adding a major emigrant campsite, river crossing, crossroads, Pony Express station, and a U.S. mail and stage station site to the public domain. Existing historical resources would be preserved for future study and public enjoyment. Public ownership of the Burnt Ranch site would also enable better access through the general area for visitors wishing to reenact historical travel on the trail,

PREFERRED ALTERNATIVE

as well as enable long-term management of local Sweetwater River frontage for the public good. Acquisition of Burnt Ranch by BLM would be in accordance with National Trails System Act guidance, which encourages acquisition of important trail resources when feasible. Acquisition would also provide for the long-term protection and preservation of a highly important National Register eligible trail resource.

Pursuing National Natural Landmark (NNL) status for a portion of Beaver Rim would establish protective status to this important natural history resource. Beaver Rim has been identified by the National Park Service as an eligible NNL candidate; NNL status provides for voluntary preservation of the natural values that exist within the NNL. This action would help to preserve the important natural values present (unique stratigraphic sequences with possible important fossil resources) at the Beaver Rim proposed NNL site. Lack of special management at this site might result in loss of identified important natural history resources, so the NNL designation/enrollment action was chosen over the alternatives not containing any actions concerning Beaver Rim.

Fire Management

The Beaver Creek area has been divided into three suppression zones (see map 5-16). Each zone and its corresponding preferred alternative is:

Zone 1

Full suppression with limited use of heavy equipment such as bulldozers was chosen as the Preferred Alternative for this zone. This means that any wildfire would be fought as soon as it was discovered, using all resources with the exception of heavy equipment such as bulldozers. If the fire were not controlled in the first burning period, a decision would be made, using the escaped fire analysis, as to whether or not heavy equipment should be used to supplement other fire-fighting resources.

Full suppression was chosen, even though there are many areas where wildfires could enhance range and wildlife habitat, because of the large amount of private and state lands and property that could be damaged as a result of wildfires started on BLM-administered lands. Prescribed burns would be used for range and wildlife habitat improvement.

Zone 2

Limited suppression was chosen as the preferred alternative for this zone. The primary objective of this type of management is to reduce suppression costs in line with the resource damage the fire would have caused. Wildfires under this alternative would be suppressed when the fire 1) exceeds or has the potential to exceed the size specified in a predetermined plan, 2) threatens private property, 3) threatens other man-made structures, or 4) threatens human life.

The Beaver Creek Management Unit has no history of large or damaging fires and only small, scattered amounts of private land are intermingled with public lands. Wildfires in this area would generally be beneficial to the wildlife habitat. Most environmental damage that occurs on fires is from the resources used to fight the fire. Under a limited suppression regime, less resource damage would occur from suppression activities, and suppression activities would be less costly.

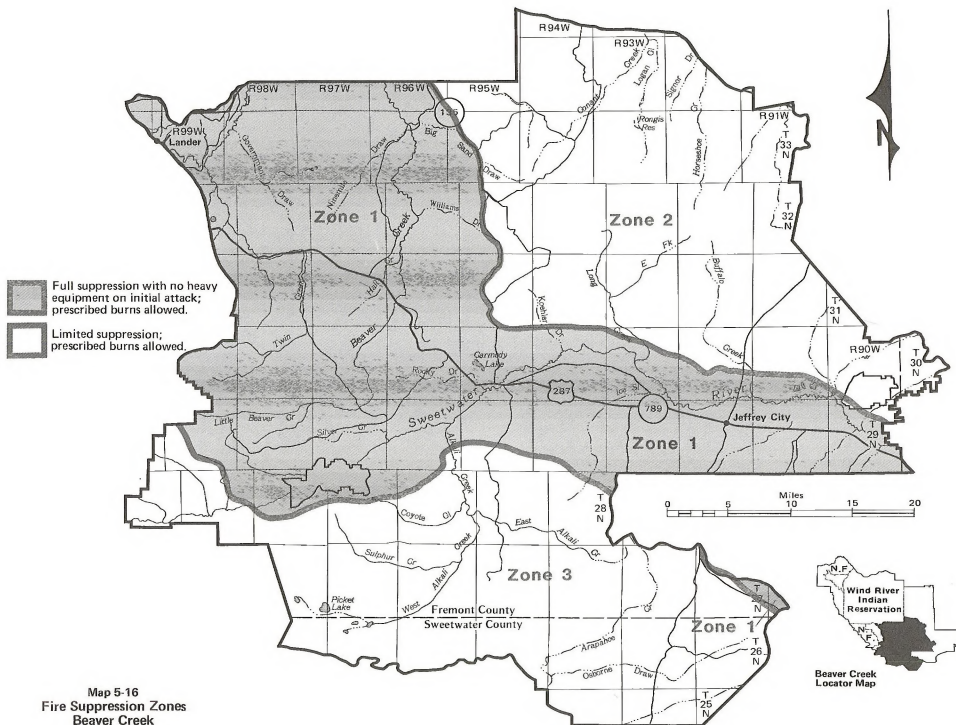
Zone 3

Limited suppression was also chosen as the Preferred Alternative for this zone. The primary objective of this technique is to reduce suppression in line with the resource damage the fire would have caused. Wildfires under this alternative would be suppressed when the fire 1) exceeds or has the potential to exceed the size specified in a predetermined plan, 2) threatens private property, 3) threatens other man-made structures, or 4) threatens human life.

Access

The Preferred Alternative is to maintain existing BLM roads and easements. In addition, BLM would negotiate with landowners for easements or initiate appropriate route alternatives to secure public access as identified in the District Transportation Plan. As of 1985, this plan calls for negotiating easements on the East Beaver Creek, Twin Creek, Government Draw, Signor Ridge, Hudson-Atlantic City, Beaver Rim, and Dilabaugh Butte roads.

This alternative provides the most realistic overall transportation plan for those areas where access is needed for resource management on public lands. Roads would be kept to the minimum BLM standards necessary for the anticipated use. No roads would be upgraded in the Sweetwater Rocks area.



PREFERRED ALTERNATIVE

Lander Slope Management Unit

The Lander Slope Management Unit contains about 25,000 acres of BLM-administered surface, 46,000 acres of federal mineral estate, and 62,000 acres of state and private land.

The Lander Slope is part of the northeast flank of the Wind River Mountains and forms the scenic backdrop for the Lander area and much of the Wind River Basin. It has a fragmented land and mineral resource ownership pattern. In recent years, industry has shown some interest in leasing oil, gas, and phosphates on the slope, even though the slope has low oil and gas potential for occurrence and low phosphate value. The area also has high recreational values, and contains one of the major concentrations of high value and crucial wildlife habitats in the resource area. There are two wintering areas used by the bald eagle and elk, and mule deer, moose and bighorn sheep forage on the slope. The Lander Slope also contains commercial quantities of timber, and the state has improved access and proposed timber harvests on parts of the slope.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the Lander Slope is to keep the area open to oil and gas leasing, with restrictions. All new oil and gas leases issued within the management unit would include a no-surface-occupancy restriction, where necessary, to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, significant cultural sites, and sensitive visual resources for this management unit, this would include the majority of the area. In addition, seasonal restrictions would be applied to the leases to protect crucial wildlife habitat areas.

The Preferred Alternative would provide for the protection of sensitive visual resources as well as crucial wildlife habitats and fragile areas, while providing for opportunities to explore and develop the oil and gas reserves within the management unit. All of the lands within the management unit have been rated as having low potential for the occurrence of oil and gas.

Locatable Minerals

Under the Preferred Alternative, the entire management unit would be open to locatable mineral exploration and development. In order to protect important scenic and wildlife values, a plan of operations would be required for all locatable mineral exploration and development operations conducted within the highly visible steep slopes and areas with important wildlife habitat. This area would be designated as an ACEC (see map 5-17 for the federal surface affected by this designation).

Because of the limited interest that has been expressed for locatable mineral exploration activities and low development potential in this area, adequate protection of significant surface resources could be achieved through the approval process for the plans of operations that would be required for all locatable mineral exploration and development activities along the Lander Slope.

Phosphates

The Preferred Alternative for management of the Lander Slope Management Unit is to include phosphate prospecting, exploration and leasing.

Phosphate activities on the Lander Slope would be restricted to prevent significant adverse impacts to scenic values and important wildlife habitat. In some cases, these restrictions would impede or prevent the economic recovery of the phosphate resource and, thereby, make mining activities difficult or impossible (see Appendix 2 for examples of these restrictive measures).

Implementation of the Preferred Alternative would be consistent with past management efforts to protect the sensitive visual resources of the unit as well as crucial wildlife habitats and fragile areas. At the present time, there are no valid phosphate prospecting permits or leases within the unit. The phosphate resources within the unit have low development potential with multiple thin seams and 18 to 24 percent P_2O_5 .

Fish and Wildlife

Under the Preferred Alternative, development and maintenance of routine fish and wildlife habitat improvement projects would be completed

PREFERRED ALTERNATIVE

after appropriate review and where consistent with capabilities and priorities. The Lander Slope Management Unit, along with the adjacent Red Canyon Management Unit, would encompass a high-priority area for development of a terrestrial habitat management plan, with elk being the primary species. There would be a cooperative effort with the Wyoming Game and Fish Department to integrate the management of their Red Canyon Habitat Management Unit into the plan.

Prescribed burns and other cultural practices would be initiated to rehabilitate elk, mule deer, moose, bighorn sheep, fisheries, and riparian habitats under this alternative.

This alternative was selected because it would establish a reasonable course of action to maintain and improve a variety of big game, fish and other wildlife habitats and reduce competition on some sites between big game species and between big game and livestock.

The Lander Slope Management Unit supports an exceptional concentration of high-value wildlife habitats, including crucial wintering range for elk, mule deer and moose; crucial yearlong range for bighorn sheep; winter habitat for bald eagles; several trout streams; and significant acreages of "high" and "moderate" priority standard habitat sites. Public lands in the Lander Slope Management Unit provide several major blocks of limiting habitat for the big game herds and other high-value wildlife inhabiting the south end of the Wind River Mountains. Considering that other land uses will continue on these lands and the shrinking habitat values on much of the nonpublic lands along the Lander Slope, it is important to establish an active program of habitat maintenance and improvement in both the Red Canyon and Lander Slope Management Units in order to maintain the exceptional fish and wildlife resource values.

Forest Management

The Preferred Alternative for the Lander Slope Management Unit is to offer one or more sales for a total of approximately 10 MMBF, to be harvested over a period of not more than 5 years. After this initial period, activity would cease for about 10 years, and the roads constructed for logging would be closed. After this period, similar sales would be offered again in the area.

This sequence of harvesting timber would allow the establishment of uneven-aged stands, which would enhance both the timber condition and

wildlife habitat. As on Green Mountain, the wildlife habitat would be enhanced by creating more forage on a continual basis. The timber condition would be improved by replacing the dead and dying stands with vigorous regeneration and by separating the harvested stands to make the future stands less susceptible to mountain pine beetle epidemics.

Harvesting of conifer stands would utilize irregularly shaped clearcuts up to 25 acres in size. Only partial cutting would be allowed within 100 feet of perennial streams. No harvesting with conventional logging equipment (bulldozers or rubber-tired skidders) will be allowed on slopes over 45 percent.

An attempt would be made to maintain a ratio of approximately 40 percent cover to 60 percent openings in the contiguous timbered areas for optimum elk habitat.

Harvested sites would be prepared for regeneration by piling and burning the unuseable debris left after logging.

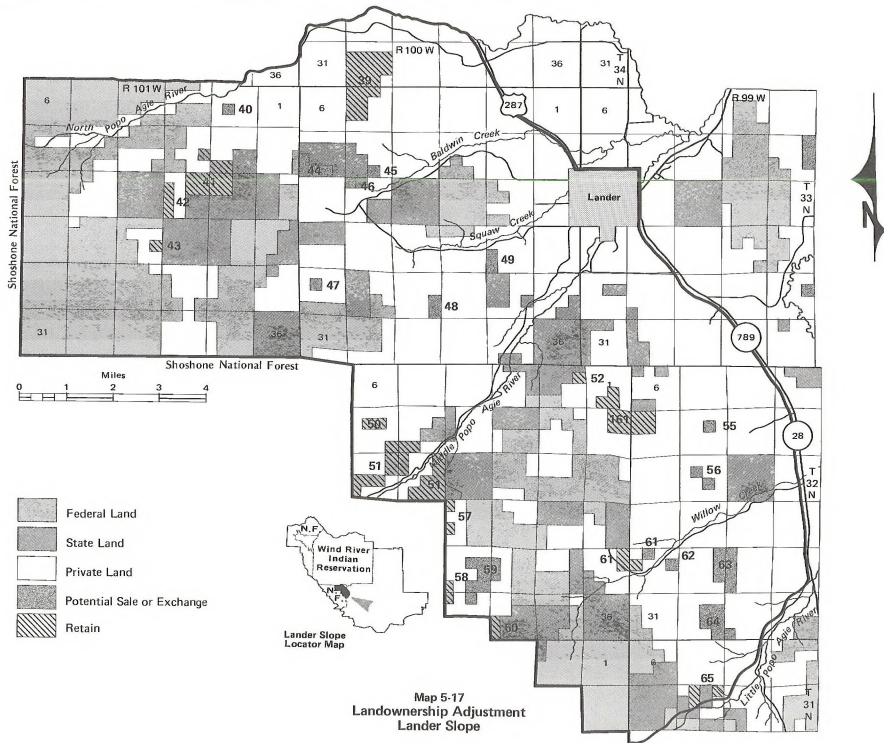
Natural regeneration would be expected because it has proven successful in the past in lodgepole pine forests, but if it were unsuccessful in certain areas, artificial regeneration (planting or direct seeding) would be employed.

Precommercial and commercial thinnings would be utilized as required to manage new timber stands.

Landownership Adjustments and Utility Systems

The Preferred Alternative is to retain 13 isolated tracts and to consider sale or exchange of 14 isolated tracts. The 13 tracts (3,040 acres) that would be retained in public ownership (see map 5-17) would include tracts 39, 41, 42, 43, 50, 51, 52, 57, 58, 60, part of 61 (SW¼NW¼ of sec. 30, T.32N., R.99W., and E¼NE¼ of sec. 25, T.32N., R.100W.), 65, and 161. The rationale for retaining these tracts is that they have important wildlife values and legal public access. In a few instances there would be no legal access, but there would be potential for a land-use change to rural homesites if the lands were disposed of, therefore adversely impacting important wildlife habitat.

The 14 tracts (1,441 acres) that would be considered for disposal by sale or exchange are tracts 40, 44, 45, 46, 47, 48, 49, 55, 56, 59, part of 61 (NE¼NW¼ of sec. 30, T.32N., R.99W.), 62, 63 and 64. The rationale for consideration of these lands is that there is no legal access to the lands



PREFERRED ALTERNATIVE

for management purposes, there are no significant or unique public resources, and there would probably be little potential for an adverse land use change if they were sold or exchanged.

Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

Recreation and Public Purpose Act patents would be issued on a case-by-case basis in response to applications and an analysis of the compatibility of the proposal with the resource values in the area.

The Preferred Alternative is to avoid the Lander Slope Management Unit when locating major utility systems. Major utility systems would be allowed only when no feasible alternative route or designated right-of-way corridor is available. The lowlands near Highway 28 and 789 would be considered for utility systems before allowing utility systems on the slopes of the mountain.

Recreation Management

The Preferred Alternative is to manage the Lander Slope Management Unit for extensive recreational opportunities, with no special management actions. A 14-day camp limit and quotas on commercial hunting camps would be set.

No major recreational developments are planned in this unit. The Lander Slope Management Unit would be managed as an extensive recreation management area where dispersed recreation rather than intensive recreational use would be encouraged and where visitors would have freedom of choice with minimal regulatory constraint. Recreation management would emphasize resolving user conflicts and providing resource protection. Establishing quotas for hunting camps would reduce conflicts between commercial recreational use permits and be in conformity with permit quotas on U.S. Forest Service lands. A 14-day camping limit would eliminate "domicile" or "homestead" camping.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to continue the present ORV designations that limit ORV use to designated roads and vehicle routes.

The existing ORV plan is consistent with adjoining national forest lands. Long- and short-term resource damage, user access requirements, and public safety suggest that limitation of ORV use would be in the best public interest. Roads and vehicle routes would be closed seasonally in order to protect the roadbed, watershed values, visual resources, and avoid disturbing wildlife on their winter range.

Fire Management

Full suppression with limited use of heavy equipment was chosen as the Preferred Alternative for the Lander Slope Management Unit. This would entail an aggressive initial attack using all available resources, with the exception of heavy ground equipment such as bulldozers. The objective would be to suppress wildfires as quickly as possible to reduce potential damage. As with other areas, the uncontrolled use of heavy equipment has the potential of creating more environmental damage than the fire itself would cause. This is a major concern in this highly scenic area on the front of the Wind River range.

The Lander Slope has large amounts of intermingled private and state lands, receives heavy recreational use and has a history of man-caused fires. It also has extensive areas of winter range habitat for big game herds. For these reasons, uncontrolled fires could have the potential of creating severe damage to various resources, and full suppression would be the most logical fire management alternative.

Access

The Preferred Alternative is to negotiate with landowners to obtain easements as identified in the District Transportation Plan. As of 1985, this plan calls for negotiating easements or initiating appropriate route alternatives to secure public access on the Shoshone Lake Road to Mormon Basin.

The Shoshone Lake Road is the key access to over 5,000 acres of blocked public land adjoining the national forest. Public access across state and private lands is needed to reach the public lands in Mormon Basin and to provide vehicle access to Mormon Basin for hunting and for reaching the national forest. Legal access is also needed for forest and wildlife management.

PREFERRED ALTERNATIVE

Red Canyon Management Unit

The Red Canyon Management Unit contains about 15,000 acres of BLM-administered surface, 17,000 acres of federal mineral estate, and 8,000 acres of state and private lands (see map 5-18). There are 128 mining claims within this management unit. These claims are primarily for bentonite and, for the most part, are not within the National Natural Landmark or the crucial elk winter range.

This management unit contains a national natural landmark and a wildlife habitat management unit for wintering elk that is managed by the Wyoming Game and Fish Department. Recently, industry has shown some interest in leasing oil, gas and phosphate, but, like the Lander Slope unit, this unit has low development potential for these resources.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the Red Canyon Management Unit is to keep the area open to oil and gas leasing, with restrictions. All new oil and gas leases issued within the management unit would include a no-surface-occupancy restriction, where necessary, to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, significant cultural sites, sensitive visual resources, and the Red Canyon National Natural Landmark. In addition, seasonal restrictions would be applied to leases to protect crucial wildlife habitat areas.

The Preferred Alternative is to provide protection of sensitive visual resources as well as crucial wildlife habitats, fragile areas and the Red Canyon National Natural Landmark. It also provides opportunities to explore and develop the oil and gas resources within the management unit. All of the lands within the management unit have been rated as having low potential for the occurrence of oil and gas. The Preferred Alternative is consistent with the management objectives for the Red Canyon National Natural Landmark, which is to preserve the natural and scenic values of the area.

Locatable Minerals

Under the Preferred Alternative, the entire management unit would be open to locatable mineral exploration and development. In order to protect important scenic and wildlife values, a plan of operations would be required for all locatable mineral exploration and development operations conducted within the highly visible steep slopes and areas with important wildlife habitat. The federal lands within this area would be designated as an ACEC (see map 5-18 for the federal lands affected).

Because of the limited interest that has been expressed for locatable mineral exploration activities and the low-development potential in this area, adequate protection of significant surface resources could be achieved through the approval process for the plans of operations that would be required for all locatable mineral exploration and development activities along the Lander Slope and within the Red Canyon National Natural Landmark.

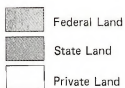
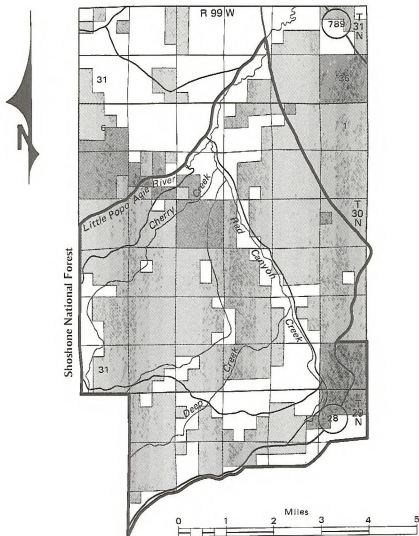
Phosphates

The Preferred Alternative for the National Natural Landmark and the crucial elk winter range within the Red Canyon Management Unit is to close these two areas to phosphate prospecting and leasing. The remainder of the unit would be open to prospecting, exploration and development, and leasing with restrictions, as appropriate to protect important surface values (see Appendix 2).

Implementation of the Preferred Alternative would be consistent with past management efforts to preserve the natural and scenic characteristics of the Red Canyon National Natural Landmark as well as crucial big game habitats, fragile areas and sensitive visual resources. There are no phosphate exploration permits or leases within the unit. The phosphate reserves within the unit have low development potential with multiple thin seams and 18 to 24 percent P_2O_5 .

Fish and Wildlife

Under the Preferred Alternative, development and maintenance of routine fish and wildlife habitat improvement projects would be completed



Map 5-18
Surface Ownership
Red Canyon

PREFERRED ALTERNATIVE

after appropriate review and where consistent with capabilities and priorities. The Red Canyon Management Unit, along with the adjacent Lander Slope Management Unit, would encompass a high-priority area for development of a terrestrial habitat management plan, with elk being the primary species. This would be a cooperative habitat management plan with the Wyoming Game and Fish Department integrating the management of their Red Canyon habitat management unit into the plan. There would continue to be an allocation of 500 AUMs of forage for elk from public lands in the management unit, as established in the 1953 cooperative agreement between the Wyoming Game and Fish Department and the BLM. Limited prescribed burns and other cultural practices would be used to rehabilitate elk, mule deer, moose, bighorn sheep, fisheries, and riparian habitats under this alternative. In-stream structures and fencing would be used in the Barret Creek drainage to improve fisheries and riparian habitat.

This alternative was selected because it provides for continuing support of the longstanding cooperative agreement with the Wyoming Game and Fish Department. It outlines a reasonable course of action to improve a variety of big game, fish and other wildlife habitats and to reduce competition on some sites between big game species and between big game and livestock.

The Red Canyon unit supports an exceptional concentration of high-value wildlife habitat, including crucial wintering range for elk, mule deer, and moose; crucial yearlong range for bighorn sheep; winter habitat for bald eagles; several trout streams; and significant acreages of high and moderate priority standard habitat sites. Public lands in the Red Canyon unit provide a major block of limiting habitat for the big game herds and other high-value wildlife inhabiting the south end of the Wind River Mountains. Considering that other land uses will continue on these lands and the shrinking habitat values on much of the nonpublic lands along the adjacent Lander Slope, it is important to establish an active program of habitat maintenance and improvement in both the Red Canyon and Lander Slope Management Units in order to maintain the exceptional fish and wildlife resource values found there.

Rare Plants and Unique Plant Communities

Under the Preferred Alternative, a management plan would be developed to identify, protect, and

maintain the habitat and population of *Trifolium barnebyi* within the Red Canyon Management Unit.

Forest Management

The Preferred Alternative for the Red Canyon Management Unit is to consider timber sales on an individual sale basis since the timber resources are very limited. The major objective in this area would be to improve wildlife habitat by utilizing prescribed burns and possibly some harvesting in the timber stands, mainly the aspen. Harvesting in the aspen stands would be limited to partial cuts or clearcuts up to 5 acres in size. This would remove the deteriorating older trees and produce regeneration. These stands would probably regenerate naturally.

This area contains many stands of aspen and several small stands of coniferous timber scattered over a large area. The area is very rugged, with little existing access. The small amount of existing access is over very rough roads to the isolated patches of timber. The past demand for timber in this area has been very minimal, mainly from the ranchers who have allotments in the area.

Harvesting in conifer stands would be limited to partial cutting to remove the dead and dying trees and facilitate regeneration. Natural regeneration would be expected, but if unsuccessful, some artificial methods would be employed.

Landownership Adjustments and Utility Systems

No public lands were considered in the unit for landownership adjustments. Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment. However, Recreation and Public Purpose Act leases and patents would be considered as applications are received.

The Red Canyon Management Unit would be avoided when locating major utility systems because of potential adverse effects to the high scenic values, wildlife habitat and watershed values. Rights-of-way for major utility systems may be granted only when no feasible alternative route or designated corridor is available.

PREFERRED ALTERNATIVE

Recreation Management

The Preferred Alternative is to develop an interpretive marker for the Red Canyon National Natural Landmark (NNL), establish a 14-day camping limit, limit commercial hunting camps, and close Red Canyon elk winter range to all winter sport activities.

A 14-day camping limit would eliminate "domicile" or "homestead" camping. An interpretive panel at the Red Canyon Overlook on U.S. Highway 287 would show the significance of the National Natural Landmark and describe the geology and wildlife values. A plaque for NNL enrollment would be furnished by the National Park Service. It could be a cooperative venture with the Wyoming Game and Fish, Wyoming Recreation Commission, Wyoming Highway Department, and BLM.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to limit ORV use to designated roads and vehicle routes and impose a seasonal closure from December 1 to June 15, as provided for in the existing ORV designations for the area.

The existing designations are consistent with adjoining national forest lands. Long- and short-term resource damage, user access requirements, and public safety suggest that limitation of ORV use would be in the best public interest. Roads and vehicle routes would be closed seasonally in order to protect the roadbed, watershed values, visual resources, and avoid disturbing wildlife on their winter range.

Cultural/Natural History

The Preferred Alternative for the cultural/natural history program in the Red Canyon Management Unit would affect one natural history resource. It would provide for preservation of the Red Canyon National Natural Landmark's (NNL) natural character and qualities.

Protection of the Red Canyon NNL would help prevent disruption and loss of natural values of this important geological landmark. This canyon is the only designated National Natural Landmark in the Lander Resource Area, and continued protection would ensure future appreciation of this classic natural history resource.

Fire Management

Full suppression with limited or restricted use of heavy equipment for fire-fighting was selected as the Preferred Alternative for the Red Canyon Management Unit. This would mean an aggressive initial attack of wildfires using all available resources, with the exception of heavy equipment such as bulldozers. If the fire were not contained during the initial attack phase, a decision could be made, utilizing the escaped fire analysis, whether or not heavy equipment should be used to supplement the other fire-fighting resources.

This area is a crucial wintering area for big game, especially elk, and it has intermingled private and state lands. It also has heavy fuel in timber stands, is adjacent to U.S. Forest Service timbered lands, and receives relatively heavy recreational use in the summer and fall.

Use of full suppression techniques would limit potential damage to big game winter range on public lands, limit potential damage on private lands in the area, reduce potential danger to recreationists, and reduce potential adverse impacts to the visual qualities in the area.

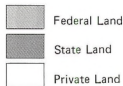
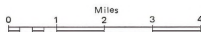
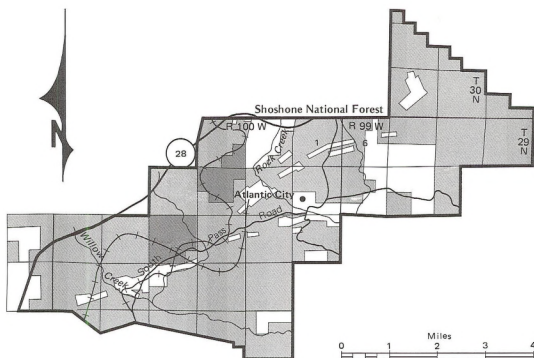
Access

The Preferred Alternative is to maintain the existing transportation system. Unnecessary roads have already been closed and rehabilitated. Currently, recreational land-use agreements provide adequate public access to BLM lands. Thus, no new easements or route alternatives have been identified at this time.

South Pass Management Unit

The South Pass Management Unit contains about 14,000 acres of BLM-administered surface, 15,000 acres of federal mineral estate, and 5,000 acres of state and private lands (see map 5-19). There are approximately 955 mining claims in this unit. These claims are primarily for gold and are spread evenly throughout the management unit.

South Pass has been the primary gold-mining region in the state of Wyoming. Settlement began in the late 1860s and has continued to the present. This unit also has significant recreational and wildlife values, including important moose habitat. The unit has low to no potential for the occurrence



Map 5-19
Surface Ownership
South Pass

PREFERRED ALTERNATIVE

of oil and gas, but other mineral resources do occur. Mining claims exist on most of the area.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the South Pass Management Unit is to keep the area open to oil and gas leasing, with restrictions. New oil and gas leases issued within the management unit would include a no-surface-occupancy restriction, where necessary, to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, significant cultural sites, critical moose habitat, and all federal mineral estate within the proposed South Pass National Register Mining District and the Atlantic City and Big Atlantic Gulch campgrounds (see map 5-20). In addition, seasonal restrictions would be applied to leases to protect important wildlife habitat areas. Upon completion of the ongoing reconnaissance inventory of historical resources within the proposed South Pass National Register Mining District, the boundary of the district would be redefined to exclude all areas that are devoid of significant historical resources.

The Preferred Alternative is to provide protection of historical resources within the proposed South Pass National Register Mining District, as well as to important wildlife habitats and fragile areas, while providing opportunities to explore for and develop the oil and gas resources within the management unit.

Locatable Minerals

Under the Preferred Alternative, the entire management unit, except for 1,727 acres presently segregated from appropriation under the mining laws, would be open for locatable mineral exploration and development. A plan of operations would be required for all locatable mineral exploration and development operations conducted within the South Pass Historic Mining District, except for those activities qualifying as casual use (see map 5-21). This area would be designated as an ACEC (see map 5-19 for the federal surface affected by this designation).

Because of the nature of the present and anticipated future locatable mineral activities (small scale gold mining and dredging) in the management unit, adequate protection of

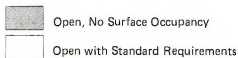
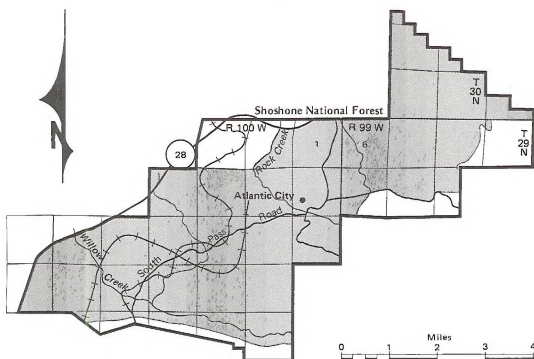
significant surface resources could be achieved through the approval process of the plans of operation that would be required for all locatable minerals activities (except casual use) within the South Pass Mining District.

Fish and Wildlife

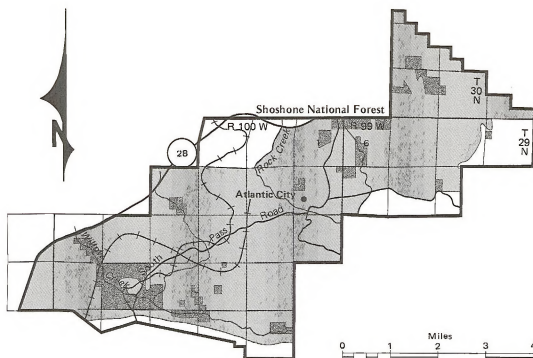
Under the Preferred Alternative, development and maintenance of routine fish and wildlife habitat improvement projects would be completed after appropriate review and where consistent with capabilities and priorities. The South Pass Management Unit would be the top priority area for development of an aquatic habitat management plan aimed at fisheries, beaver and riparian habitat improvement. Special management action under the plan would include aspen management, beaver management, in-stream structure development, and fencing. Additional emphasis would be placed on this unit to improve conifer, aspen, willow-riparian, and other shrub stands, which make up an important part of the winter range for the Lander moose herd and provide important habitat for many other species. Prescribed burns and other cultural practices designed to promote aspen and willow regeneration and improve conifer stands would be implemented.

This alternative was selected because it provides the necessary management emphasis to begin correcting the problems of damaged and deteriorated aquatic habitats, winter moose range, and riparian habitats, plus it begins to develop the potential for enhancement of these habitats and associated recreational opportunities. The South Pass unit is the core area of the most extensive stream fishery resource on public land in the resource area. It also supports one of the most important concentrations of winter moose habitat.

There is high demand for the fishing opportunities in the area as a result of the local and regional recreational use attracted to the South Pass historical area, the varied wildlife resources, the area's pleasing aesthetic qualities, and the camping facilities. Gold mining activities, which have been occurring for over 100 years, continue to damage the fisheries and riparian habitats in the unit. Long-term excessive grazing of stream bottoms has also caused serious damage to aquatic and riparian habitats. Protection and enhancement of these habitats occurring on public lands would help offset these losses.



Map 5-20
Oil and Gas Leasing
South Pass



Map 5-21
Locatable Minerals
South Pass

PREFERRED ALTERNATIVE

Rare Plants and Unique Plant Communities

Under the Preferred Alternative, a management plan would be developed to identify, protect, and maintain the habitat and population of rare plants, *Antennaria arcuata*, *Arabis Williamsii*, and *Arabis pusilla* within the South Pass Management Unit. However, the populations of *Arabis Williamsii* and *Arabis pusilla* that lie northwest of Wyoming Highway 28 would not be included within the Lander RMP/EIS. These populations located northwest of Highway 28 are within the Green River Resource Area, Rocks Springs District. Their special management concerns would be included within the Green River Resource Area RMP. This management concern and the population location information will be made available to the Green River Resource Area staff.

Forest Management

The Preferred Alternative for the South Pass Management Unit is to sell small volumes of timber on a demand basis to local commercial timber-cutters. There are only about 150 acres of conifer stands remaining that contain significant amounts of harvestable timber. Harvesting in these stands would be limited to partial cuts to remove the dead and dying timber and to regenerate the stands. This will leave residual stands to help maintain wildlife cover and watershed protection.

Aspen stands would be managed to create healthy wildlife habitat. This could take the form of harvesting in clearcuts or prescribed burning.

Natural regeneration would be expected on the harvested areas. If this were not successful in certain areas, artificial methods (planting or direct seeding) would be employed.

Landownership Adjustments and Utility Systems

There were no tracts considered for sale or exchange in the South Pass Management Unit. Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment. However, Recreation and Public Purpose Act leases and patents would be considered as applications are received.

The Preferred Alternative is to avoid the area when locating major utility systems. Rights-of-way for major utility systems might be granted if no feasible alternative route or designated right-of-way corridor were available. The rationale is that historical and cultural values would be adversely impacted by major utility systems. The area is also very scenic, with fairly intensive recreational use, and it is important to maintain these values.

Recreation

The Preferred Alternative is to maintain existing campgrounds and facilities. No new campgrounds would be built.

The South Pass Historic Mining Area is a special recreation management area. Management would be oriented toward maintaining recreational opportunities in terms of rustic, open-space settings. Areas of intensive management would include existing campgrounds, the Miners Delight Townsite, and Peabody Ridge Overlook. Development would be limited to facilities that would protect visitors and resources. There is strong public sentiment for maintaining this area with minimal developments. A management plan would provide detailed planning for special recreation management areas. This plan will be written in conjunction with the cultural resource plan for the South Pass area.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to continue the present ORV designations that limit ORV use to existing roads and vehicle routes. This designation is determined to be appropriate for the majority of the public lands by accommodating access needs, while providing resource protection. It limits ORV use to existing roads, except for casual use such as picking up a game animal during hunting season.

Cultural/Natural History

The Preferred Alternative for the cultural/natural history program in the South Pass Management Unit would affect several historical mining resources. It would provide a management plan to guide activities within the proposed South Pass National Register Mining District. The plan would include the following three management actions: accelerated stabilization, preservation, and protection of all significant historical sites

PREFERRED ALTERNATIVE

within the proposed South Pass National Register Mining District; historical site patrol to deter vandalism; and conformance with local historical zoning laws on public lands surrounding South Pass City. The Preferred Alternative would also provide for limited test excavations at the Miners Delight historical townsite to facilitate interpretation of the site.

A management plan for the proposed South Pass National Register Mining District would provide a well-planned management program for this fragile and important historical area. Accelerated stabilization, preservation, and protection of all significant historical sites would prevent deterioration of the various 19th and early 20th century historical resources located within the South Pass area. Many of the historical resources of the area have already suffered from natural and human caused deterioration such as weathering, damage from livestock, and damage from vandalism; therefore, short-term action is necessary to prevent severe damage to historical sites. For this reason, accelerated protection measures were chosen over more gradual measures.

Patrolling and monitoring of sites in the proposed South Pass National Register Mining District would deter destruction of historical sites by vandals. Over the past 20 years, artifact hunters and vandals have caused a high loss of historical integrity in the sites of South Pass and have destroyed entire standing historical structures in some cases. BLM has invested substantial amounts of money to provide for public use and enjoyment of the South Pass area; therefore, control of vandalism is necessary to preserve one of the main attractions of South Pass, the historical resources.

Conformance with a local historical zoning ordinance around South Pass City by BLM would provide for maintenance of the historical setting surrounding the town. BLM is a participant in the preservation of the historical values of the local area (BLM leases lands that possess historical structures to the Wyoming Recreation Commission for historical appreciation purposes) and recognizes the local residents' wishes to maintain the historical character of the area. In addition, the public lands in the section in which South Pass City lies are within the South Pass City National Register site.

Limited test excavations within the Miners Delight townsite would help our understanding of the various occupations that occurred at the site. Accounts of the townsite's history are limited and little is known of the site before its 1910 to

1914 occupation phase. This limited test excavation management action was chosen because limited excavations would facilitate interpretation of the site for the public benefit.

Fire Management

Full suppression was chosen as the Preferred Alternative for the South Pass Management Unit. This would entail utilizing all available resources to suppress wildfires in the area.

There are potential negative aspects of unrestricted use of equipment, such as damage to soils, vegetation and stream courses by heavy equipment and the potential visual and environmental degradation from fire retardant released from planes. However, this is a very high-use recreation area containing two active communities (South Pass City and Atlantic City), a state park in South Pass City and many historical mining structures. It also has many other resource values including fisheries, wildlife, recreation, soils and forestry. In addition, there are intermingled private lands with property such as homes and mine facilities that need protection from wildfires starting on public lands.

With the many resource values and the large amounts of private lands that could be damaged by uncontrolled fires, BLM decided to continue a policy of full suppression.

Access

The Preferred Alternative is to maintain existing BLM roads and easements. The existing transportation system provides adequate recreational access for the South Pass Area.

Gas Hills Management Unit

The Gas Hills Management Unit contains about 872,000 acres of BLM-administered surface, 1,060,000 acres of federal mineral estate, and 378,000 acres of state and private lands.

Gas Hills is an important management unit for oil and gas leasing and development. Until the recent slump in uranium markets, uranium mining and milling were significant activities in the area. Livestock grazing and rangeland management are also important issues in this unit, and there are several important winter ranges for elk, deer and

PREFERRED ALTERNATIVE

antelope. Part of the Oregon/Mormon Pioneer Trail runs through this unit, and another highly significant cultural site, Castle Gardens, is in the northern portion of the unit.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the Gas Hills Management Unit is to keep the entire unit open for oil and gas leasing (see map 5-22). New oil and gas leases issued in areas rated as having moderate, low or no potential for the occurrence of oil and gas reserves would include a no-surface-occupancy restriction to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, significant cultural sites (including 80 acres at the Castle Gardens rock art and picnic site), $\frac{1}{4}$ mile either side of designated portions of the Oregon/Mormon Pioneer Trail or the visible horizon, whichever is closer, Martin's Cove National Register Site, Devil's Gate Landmark, fragile lands along the Oregon/Mormon Pioneer Trail, and the interpretive site at Devil's Gate. In addition, seasonal restrictions would be applied to leases to protect important wildlife habitat areas. In areas with moderate, low or no potential for occurrence of oil or gas, restrictions would be applied automatically prior to lease issuance. These restrictions would be waived later if appropriate. In areas with high potential for the occurrence of oil or gas including KGSS, restrictions would not be automatically applied prior to lease issuance. Instead, new oil and gas leases in these areas would be conditioned with no-surface-occupancy and seasonal restrictions on a case-by-case basis and only when necessary to avoid a significant adverse impact to another resource. This alternative would further provide for the enhancement of oil and gas development in KGSS and high-potential areas through the waiver of lease restrictions following a commitment from the lessee that adverse impacts to other resources could be acceptably mitigated.

Implementation of the Preferred Alternative would allow for maximum management flexibility over the full range of resources. In areas of moderate, low and no potential for occurrence of oil and gas, this alternative would allow enhanced management of the surface resources, while providing opportunities for exploration and development of the oil and gas resources. Conversely, in areas of high potential for the occurrence of oil and gas or in areas of established

production such as KGSS, this alternative allows enhanced management of exploration and development activities by minimizing the restrictions imposed on these activities.

Locatable Minerals

The Gas Hills Management Unit would be open to locatable mineral exploration and development, except for 80 acres at Castle Gardens, presently segregated from appropriation under the mining laws, 830 acres presently withdrawn from appropriation under the mining laws (Devil's Gate Landmark, Devil's Gate Interpretive Site, and fragile lands along the Oregon/Mormon Pioneer Trail) and an additional 680 acres around the Martin's Cove National Register Site, which is proposed to be withdrawn from appropriation under the mining laws (see map 5-23). In addition, a plan of operations would be required for all locatable mineral exploration and development activities on significant sites and segments along the Oregon/Mormon Pioneer Trail (e.g., ruts, swales, graves, campsites, pristine settings, etc.). These sites and segments would be designated as ACECs. See map 5-14 for the federal surface affected by this designation.

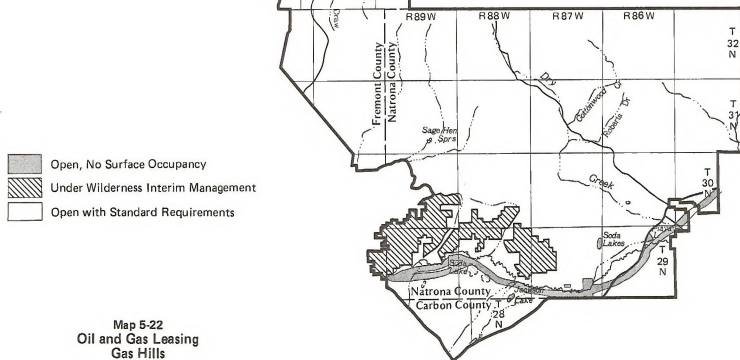
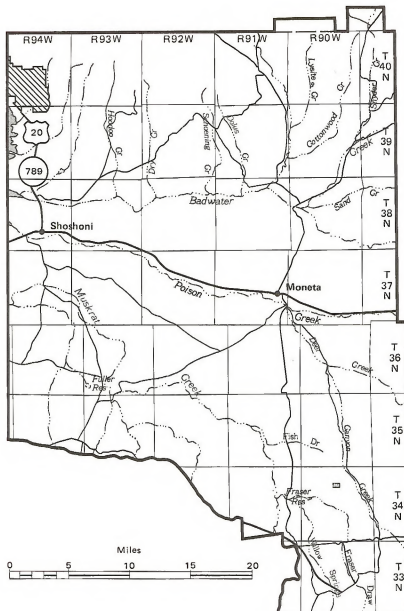
The Preferred Alternative would place few restrictions on locatable mineral exploration and development and then only in areas where these activities could cause significant adverse impacts on other significant resource values. This alternative maximizes opportunities for the exploration for and development of locatable mineral resources.

Fish and Wildlife

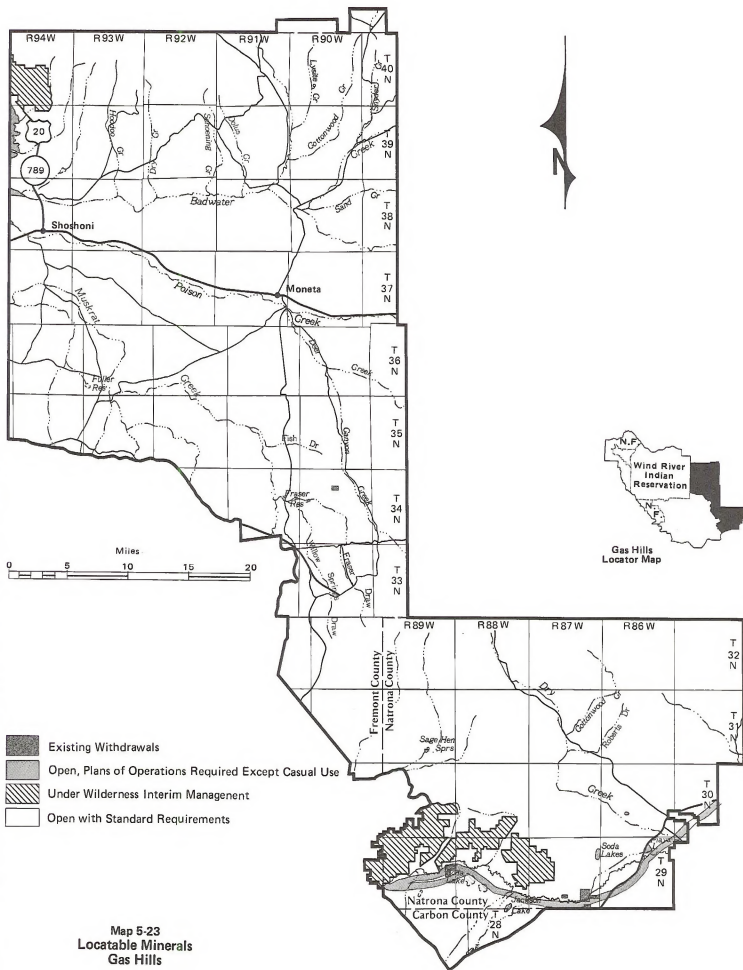
The Preferred Alternative is to provide for development of routine fish and wildlife habitat improvement projects and maintenance of existing projects after appropriate review and where consistent with program capabilities and priorities. BLM will cooperate with the Wyoming Game and Fish Department, interested sportsmen, conservation groups, and adjacent landowners in efforts to develop a workable bighorn sheep reintroduction program for the Sweetwater Rocks area.

This alternative was selected based on the following:

- The Wyoming Game and Fish Department has asked BLM to consider approval of a bighorn sheep reestablishment program in this ancestral bighorn range. A recent habitat/



Map 5-22
Oil and Gas Leasing
Gas Hills



PREFERRED ALTERNATIVE

forage inventory covering over 40,000 acres of the reintroduction area has been conducted. The results of this inventory indicated that there is an ample amount of suitable habitat available. The total potential habitat area is about 85 percent BLM land and 15 percent state and private rangeland. About 67 percent of the total habitat area is unused and unsuitable for livestock grazing. This 67 percent represents the best potential bighorn habitat. It is largely unoccupied, with the exception of a relatively low density mule deer population. Assuming 50 percent of the forage production for allowable use and reserving adequate forage for the mule deer herd, there is ample forage in the area unused by livestock to support several times the number of bighorns proposed as a possible long-term population goal (up to 400 sheep, base population). If a successful reintroduction program were accomplished, the following benefits would be realized:

- A previously extirpated species would be restored to ancestral habitat.
- Unoccupied public land habitat would be restored to big game production.
- The population of one of the state's and nation's most valuable, prized, and scarce big game animals would be expanded.
- Opportunities for aesthetics and sport hunting would be increased.

The most significant concerns yet to be worked out are those expressed by adjoining landowners. Their concerns include sheep use on adjacent private lands and the added time and expense of managing people in the area (e.g. trespass and requests for permission to cross private lands).

Landownership Adjustments and Utility Systems

A total of 60 isolated tracts of public land were reviewed to determine whether they should be sold, exchanged or retained in public ownership. The Preferred Alternative is to retain 20 isolated tracts and consider 40 tracts for sale or exchange (see map 5-24).

Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

The 20 tracts, encompassing approximately 2,302 acres, which would be retained are tracts 94, 95, 103, 104, 107, 111, 113, 114, 115, 116, 117, 120, 142, 148, 151, 152, 153, 154, 155, and 157. The rationale for retaining these tracts is that they have high value for public recreation because of existing legal access or they have historical value associated with the Oregon/Mormon Pioneer Trail. Tract 120 contains wildlife water development.

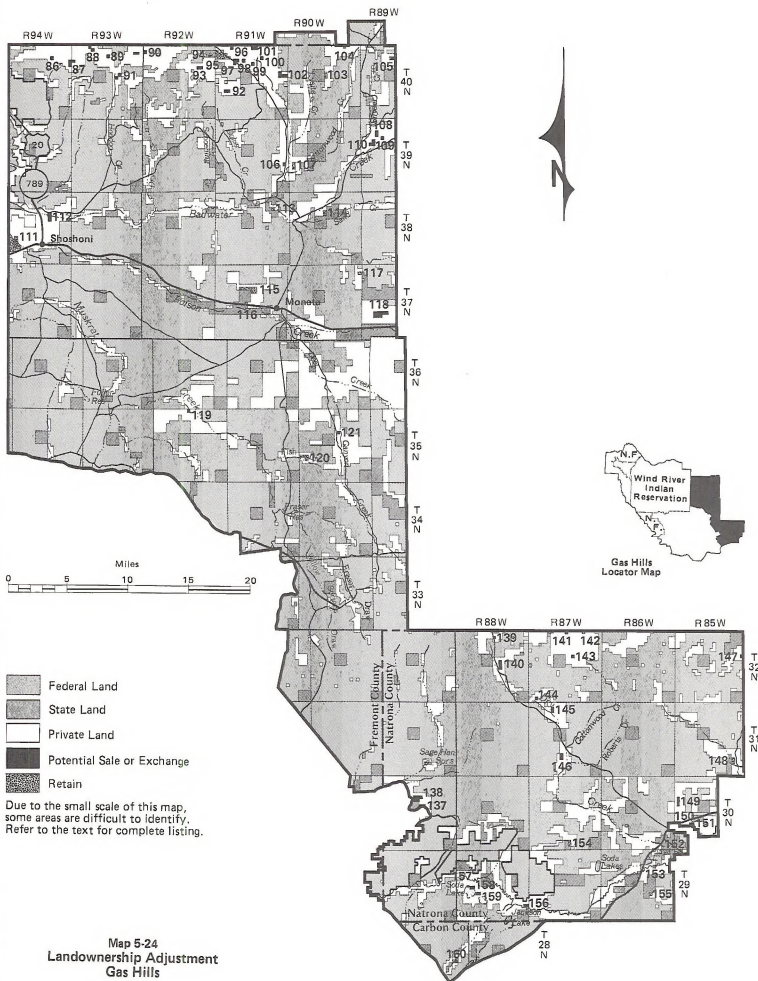
The 40 tracts, totaling approximately 3,472 acres, which could be considered for sale or exchange, are tracts 86, 87, 88, 89, 90, 91, 92, 93, 96, 97, 98, 99, 100, 101, 102, 105, 106, 108, 109, 110, 112, 118, 119, 121, 137, 138, 139, 140, 141, 143, 144, 145, 146, 147, 149, 150, 156, 158, 159, and 160. The rationale for considering these tracts for sale or exchange is that the majority are small and very isolated without legal access. The lands do not have unique or significant resource values and the existing land use probably would continue as livestock grazing and wildlife habitat. Tracts 158 and 159 have public access but do not have significant resource values. The preferred method of disposal for these tracts would be for exchange purposes to enhance management of cultural, recreation, wildlife, or other resources on public land.

Recreation and Public Purpose Act leases and patents would be issued on a case-by-case basis. The rationale for this alternative is that R&PP actions would be analyzed in response to applications, and decisions as to compatibility with the unit's resource values would be considered at that time.

The Preferred Alternative also includes allowing major utilities in the area, except for along the Oregon/Mormon Pioneer Trail corridor and Sweetwater Rocks. Rights-of-way for major utility systems might be granted if no feasible alternative route or designated right-of-way corridor were available. Utility systems would be concentrated in existing corridors whenever possible. The rationale for this alternative is that there would be no significant impact resulting from major utility systems, especially when located in existing corridors and outside the two high resource value, avoidance areas identified above.

Recreation Management

The Preferred Alternative would maintain existing BLM developments at the Devil's Gate interpretive site and Castle Gardens picnic site.



PREFERRED ALTERNATIVE

The Devil's Gate interpretive site is incorporated in the management plan for the Oregon/Mormon Pioneer Trail. The plan provides detailed planning with specific objectives for use by visitors, resource protection, and interpretive needs consistent with public demand. Castle Gardens is an extensive recreation management area and, as with the rest of the Gas Hills unit, dispersed recreation would be encouraged. Other than additional interpretation and resource protection at Castle Gardens, recreation management and maintenance would be minimal, with emphasis on resolving user conflicts and providing resource protection.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to limit ORV use to existing roads and vehicle routes, except for the Castle Gardens withdrawal area, which would be closed to ORV use.

An ORV designation of "limited to existing roads and vehicle routes" is determined to be appropriate for the majority of the public lands by accommodating access needs while providing resource protection. An ORV closure on the 80-acre protective withdrawal area at Castle Gardens would protect fragile soils, rock outcrops and Class A scenery. The BLM road to the picnic site would remain open in the closed ORV area.

Cultural/Natural History

The Preferred Alternative for the cultural/natural history program in the Gas Hills Management Unit would affect two significant cultural resources. It would ensure that all actions are consistent with the Oregon-Mormon National Historic Trail Management Plan and would provide for a management plan that would include provisions for walkways and further fencing at the Castle Gardens rock art site.

The Oregon/Mormon Pioneer Trail Management Plan (described in Chapter II) establishes protection, use, and management guidelines for public land trail resources throughout Wyoming, including the Lander Resource Area. Recommendations now formulated for the trail would establish the following in the Gas Hills Management Unit: a ¼ mile or visible horizon corridor (whichever is closer) on each side of selected trail segments where modern intrusions and disturbances would be minimized or prohibited, a protective withdrawal for the Martin's Cove

National Register Site, and a continuation of the protective withdrawal at the Devil's Gate Historic Landmark and fragile lands along the Oregon/Mormon Pioneer Trail. Adoption of these recommendations in the RMP would provide continued protection of this National Historic Trail and two of its highly important sites. This type of management would ensure compliance with National Trails System Act requirements for the protection of important trail segments and sites, as well as provide for the preservation of several National Register listed and eligible trail properties. It would also continue long-standing past efforts of BLM to preserve and encourage public enjoyment of the trail.

Development of a management plan would provide for a well planned framework to guide activities within the Castle Gardens rock art site. The plan would include installation of walkways and extra protective fencing at Castle Gardens, which would help halt deterioration of a regionally significant prehistoric rock art site. This National Register enrolled site, which the BLM has developed as an interpretive site, is suffering impacts from erosion caused by human traffic on the site and from defacing of the rock art by vandals. Positive action to prevent these impacts would help protect the rock art site and its surroundings. No action could result in adverse effects to the site and diminish the value of BLM's prior investments at the site.

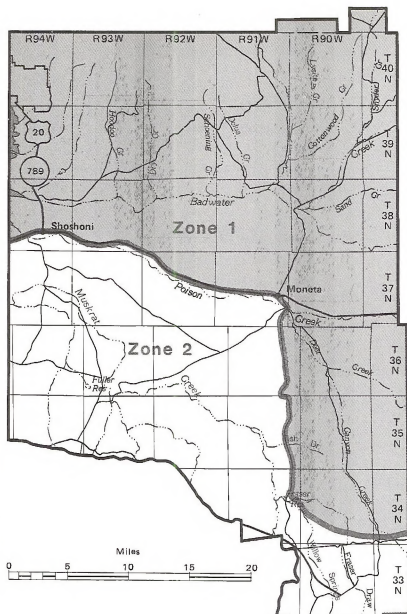
Fire Management



The Gas Hills Management Unit has been divided into three suppression zones (see map 5-25). Each zone and its corresponding preferred alternative are as follows:

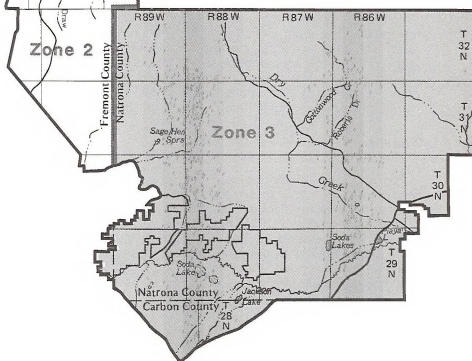
Zone 1

Full suppression with limited use of heavy equipment is the Preferred Alternative for this zone. This would mean an aggressive initial attack with all available resources, with the exception of heavy equipment such as bulldozers. If the fire were not controlled during initial attack, a decision would be made whether or not to use heavy equipment, based on the escaped fire analysis.

There are many areas within this zone where wildfires could be safely managed without full suppression. However, there are large areas of intermingled private lands where it would be difficult, under certain circumstances, to limit wildfires to public lands. There is also big game



-  Full suppression with no heavy equipment on initial attack; prescribed burns allowed.
-  Limited suppression; prescribed burns allowed.



Map 5-25
Fire Suppression Zones
Gas Hills

PREFERRED ALTERNATIVE

winter range that could be damaged by uncontrolled wildfires.

Zone 2

Limited suppression was chosen as the Preferred Alternative for this zone. The primary objective of this type of management is to reduce suppression costs in contrast to damages the fire would have caused. A fire in this area would be observed and suppression would occur when the fire: 1) exceeds or has the potential to exceed the size specified in a predetermined plan, 2) threatens private property, 3) threatens other man-made structures, or 4) threatens human life.

This area has a history of fires on an average of one every 3 years. There is a very small amount of intermingled private lands. The resource damage caused by wildfires is less than the damage that would be created by fire-fighting equipment and people. Also, the use of limited suppression is less costly than full suppression.

Zone 3

Full suppression with limited use of heavy equipment was chosen as the Preferred Alternative for this zone. This would mean an aggressive initial attack on all wildfires with all available resources, with the exception of heavy equipment such as bulldozers. If the fire were not controlled after the initial attack, a decision based on the escaped fire analysis would be made as to whether or not to allow the use of heavy equipment.

Full suppression was chosen, even though there are many areas where wildfires could enhance range and wildlife habitat, because of the large amount of private and state lands that could be damaged as a result of wildfire started on BLM-administered lands. Prescribed burns would be used for range and wildlife habitat improvement.

Access

The Preferred Alternative is to negotiate with landowners for administrative access and easements as identified in the District Transportation Plan. As of 1985, this plan calls for negotiating easements or initiating appropriate route alternatives to secure public access on the Copper Mountain Road, Wolf Gap, Beef Gap, and Beaver Rim Roads.

The county road system provides some public access for the Gas Hills Management Unit. BLM

would continue to maintain the Castle Gardens access road. Easements for administrative access on Copper Mountain are needed to maintain BLM's radio repeater site on state land. Public access is needed in the Sweetwater Rocks area via Beef Gap and Wolf Gap Roads. Other alternatives will be considered in easement negotiations.

East Fork Management Unit

The East Fork Management Unit contains about 950 acres of BLM-administered surface, 3,400 acres of BLM-administered lands that are dedicated as Wildlife Coordination lands, 14,000 acres of federal mineral estate, and 12,000 acres of state lands. There are 8 mining claims in this unit. These claims are primarily for precious metals and lie along the fringe of the big game winter range.

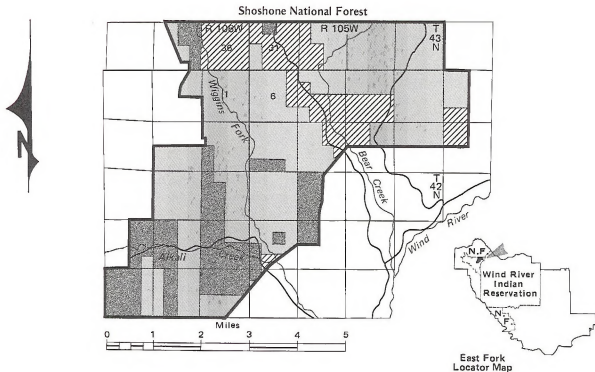
The East Fork big game winter range is one of the most outstanding managed elk winter ranges in the West. As many as 3,500 elk winter on the 17,000 acres in this unit (approximately 1,000 acres are administered by BLM). East Fork was established as a winter range for elk in 1947, because the elk were threatening the livelihood of ranchers in the area. In 1972, BLM entered into a cooperative management agreement with the state of Wyoming that committed BLM to: 1) not issue livestock grazing leases in the unit, and 2) to manage the area as an elk winter range requiring other public uses to be compatible with that purpose.

The unit has low to moderate development potential for oil and gas and low potential for other mineral resources. As of December 1981, BLM had issued oil and gas leases on about 4,000 acres, and the state of Wyoming had issued oil and gas leases on another 600 acres of state lands within the unit.

Energy and Minerals

Oil and Gas

A modified Alternative A was selected as the Preferred Alternative for the East Fork Management Unit. The management unit would be designated a no-leasing area for oil and gas. Should drainage occur, BLM would recommend leasing under such stipulations as agreed upon by the Wyoming Game and Fish Department, the U.S. Fish and Wildlife Service, and the BLM (see map 5-26).



Map 5-26
Oil and Gas Leasing
East Fork

PREFERRED ALTERNATIVE

The Preferred Alternative would be consistent with cooperative management efforts of the Wyoming Game and Fish Department, U.S. Fish and Wildlife Service and the Bureau of Land Management to manage the area as an elk winter range. The federal mineral estate within the unit has been rated as having low to moderate potential for the occurrence of oil and gas.

Locatable Minerals

The Preferred Alternative for management of the East Fork Management Unit is to designate the area as an ACEC (see map 5-28 for the federal surface affected by this designation) and close approximately 13,855 acres of federal mineral estate to locatable mineral exploration and development (see map 5-27). By Public Land Order 888 (March 30, 1953) and Public Land Order 4644 (April 18, 1969), 3,432 acres were withdrawn from appropriations under the mining laws and made available for use as a crucial winter range for elk. These lands are controlled by the Wyoming Game and Fish Department through a cooperative agreement with the U.S. Fish and Wildlife Service under the provisions of the Coordination Act (60 Stat. 1080, U.S.C. 661-666 c). Implementation of this alternative would require the withdrawal of approximately 10,423 acres of federal mineral estate from appropriations under the mining laws.

The Preferred Alternative would be consistent with cooperative management efforts of the Wyoming Game and Fish Department, U.S. Fish and Wildlife Service and the Bureau of Land Management to manage the area as an elk winter range.

Fish and Wildlife

The Preferred Alternative for the East Fork Management Unit is to continue cooperative habitat improvement projects developed with the Wyoming Game and Fish Department. These would include a variety of actions such as prescribed burning or other cultural practices, seeding, pitting, herbicide treatment, water development, etc. Any projects initiated would be designed to improve habitat for wintering elk, the priority species on the unit, or to benefit other species if the project would not cause significant negative effects on the elk population. Projects that would benefit elk, but that would also have significant negative effects on other important species, probably would not be undertaken.

This alternative was selected because any habitat improvement action taken under it would

be consistent with the Wyoming Game and Fish Department's management objectives for the East Fork Big Game Winter Range and, therefore, with Wyoming Game and Fish Department/Bureau of Land Management cooperative agreements and the Public Land Orders effecting the unit.

Landownership Adjustments and Utility Systems

The Preferred Alternative includes consideration of disposal for tracts 24, 25, 26 and 27, totaling approximately 961 acres, in public ownership. The tracts would be considered for disposal (exchange or sale) only to public agencies or private organizations which would use the lands in a manner consistent with the management objectives of the East Fork elk winter range (see map 5-28). Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment. The rationale for the Preferred Alternative is that the lands are an integral part of the East Fork Big Game Winter Range and the disposal of these lands to other than the two entities discussed above would be detrimental to the management of this regionally important elk winter range. The lands are also high-value recreational lands and should, therefore, remain in some form of public ownership.

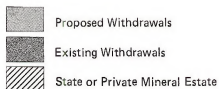
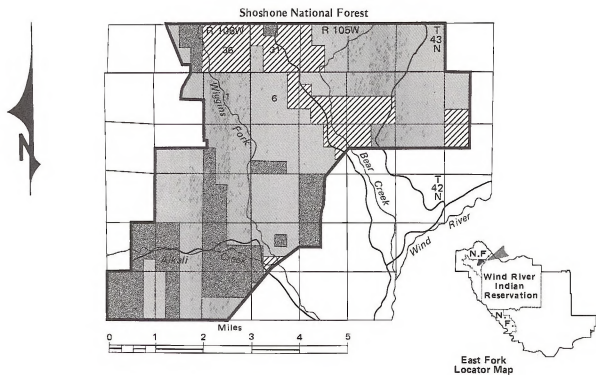
The Preferred Alternative also includes issuing Recreation and Public Purpose Act patents on a case-by-case basis. The Preferred Alternative additionally provides for avoiding the area when locating major utility systems. Rights-of-way for major utility systems might be granted if no feasible alternative route or designated right-of-way corridor were available.

Recreation Management

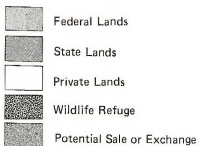
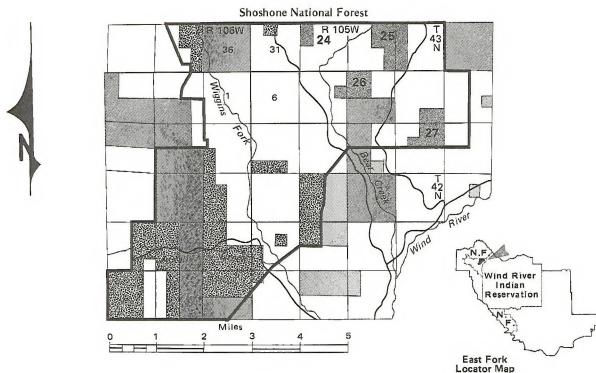
The East Fork Management Unit requires minimal management for recreation. Emphasis would be on resolving user conflicts and providing resource protection.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to limit vehicular traffic to existing roads and vehicle routes. This



Map 5-27
Locatable Minerals
East Fork



Map 5-28
Landownership Adjustment
East Fork

PREFERRED ALTERNATIVE

designation provides adequate resource protection, while accommodating access needs.

Fire Management

Full suppression was chosen as the Preferred Alternative for the East Fork Management Unit. This would entail an aggressive initial attack with all available resources, with the objective of suppressing wildfires as quickly as possible.

This area is an established winter range for elk and other big game species. The destruction of a large portion of this winter range by uncontrolled fires would force the animals onto adjacent private lands, thus causing serious conflicts between the elk herd and livestock grazing.

The area is also under the cooperative agreement for initial suppression with the U.S. Forest Service.

Access

The Preferred Alternative is to maintain the existing transportation system. Adequate public access is available to public lands in the East Fork Management Unit.

Dubois Badlands Management Unit

The Dubois Badlands Management Unit contains about 5,000 acres of BLM-administered surface, 11,000 acres of federal mineral estate, and 6,600 acres of state and private lands. There are no mining claims within the Dubois Badlands Management Unit.

This management unit contains 4,500 acres of highly eroded badland topography banded by red, gray and white clay soils. The unit provides important habitat for bighorn sheep, elk, deer, and antelope. This area has moderate potential for occurrence of oil and gas. It is unknown if there is any potential for other minerals.

The Dubois Badlands unit was a wilderness study area until December 30, 1982, when the Secretary of Interior dropped all wilderness study areas under 5,000 acres in size from further consideration for wilderness. During the writing of the RMP, this decision was reversed. (For more

details on how this issue will be addressed, see Chapter II, Management Actions Common to All Alternatives.)

Energy and Minerals

Oil and Gas

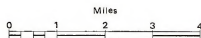
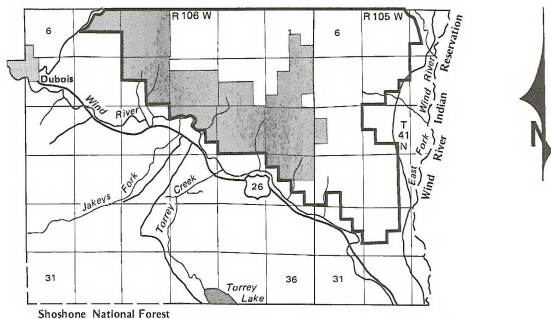
The Preferred Alternative for management of the Dubois Badlands is to keep the entire unit open to oil and gas leasing, with restrictions to protect significant surface resource values. This would include applying a no-surface-occupancy restriction to all new oil and gas leases issued on 4,500 acres, which has moderate potential for the occurrence of oil and gas. These 4,500 acres were previously included in the Dubois Badlands WSA. No-surface-occupancy restrictions would be applied to new leases throughout the remainder of the management unit to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, and significant cultural resources. In addition, exploration activities would be seasonally restricted in important wildlife habitat areas (see Appendix 2 for these restrictive measures).

The Preferred Alternative would provide for the protection of the natural and visual characteristics of the Dubois Badlands area as well as crucial wildlife habitats and fragile areas, while providing opportunities to explore for and develop the oil and gas reserves within the management unit (see map 5-29).

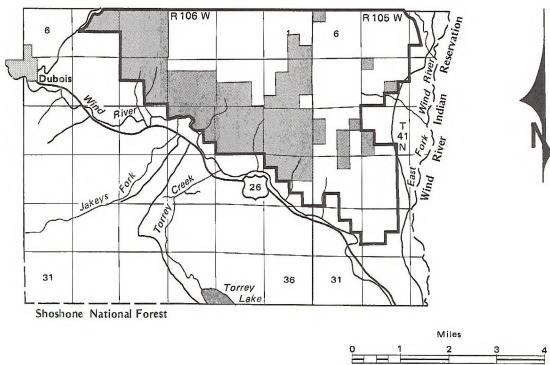
Locatable Minerals

Under the Preferred Alternative, the entire management unit would be open for exploration and development of locatable minerals. In addition, a plan of operations would be required for all locatable mineral exploration and development operations conducted within that portion of the unit previously included within the Dubois Badlands WSA (see map 5-30). This area would be designated as an ACEC (see map 5-31 for the federal surface affected by this designation).

Because of the limited interest that has been expressed for locatable mineral exploration activities and the low development potential in this area, adequate protection of significant surface resources could be achieved through the approval process for the plans of operations that would be required for all locatable mineral exploration and development activities.



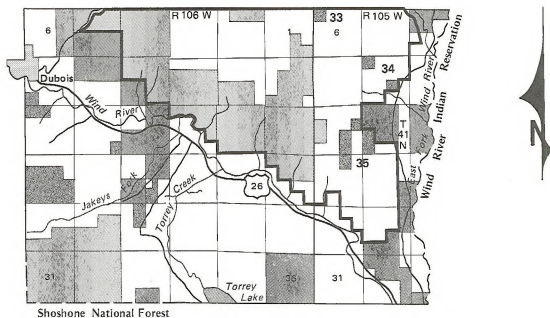
Map 5-29
Oil and Gas Leasing
Dubois Badlands



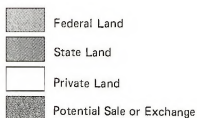
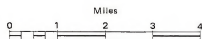
-  Open, Plans of Operations Required Except Casual Use
-  Open with Standard Requirements



Map 5-30
Locatable Minerals
Dubois Badlands



Shoshone National Forest



Map 5-31
Landownership Adjustments
Dubois Badlands

PREFERRED ALTERNATIVE

Fish and Wildlife

Under the Preferred Alternative, routine fish and wildlife habitat improvement projects and maintenance of existing projects would be completed after appropriate review and would be consistent with program capabilities and priorities.

Landownership Adjustments and Utility Systems

The Preferred Alternative is to consider disposal by sale or exchange of three small isolated parcels (33, 34 and 35) of public land, which total approximately 359 acres (see map 5-31). Exchange is the preferred method of disposal. Proposals for sale or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

These parcels have crucial and important wildlife values for elk, deer, and bighorn sheep, and the public views these lands in this unit as being valuable for wildlife. However, these tracts are small and quite isolated from the remaining public lands in this unit and there is no legal access for management purposes. It is not likely that the existing land use, livestock grazing and wildlife habitat, would change if the lands were exchanged. This assumption is based on the lack of access and the fact that the surrounding landowners (livestock operators) would have the first opportunity to purchase the parcels, if sold.

The Preferred Alternative is to issue Recreation and Public Purpose Act patents on a case-by-case basis. The rationale for this alternative is that R&PP actions would be analyzed in response to applications, and decisions as to compatibility with the unit's resource values would be considered at that time.

The Preferred Alternative includes avoiding the Dubois Badlands when routing major utility systems. Rights-of-way might be granted if no feasible alternative route or designated right-of-way corridor were available. Rationale for this alternative is that the scenic, watershed and wildlife habitat values of the Dubois Badlands would be protected.

Recreation Management

The Dubois Badlands is an extensive recreation management area that would be managed in its natural state. Recreation management would emphasize resolving competing uses and providing resource protection.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to close the entire unit to ORV use. A closure would protect outstanding scenery and natural values. There is strong public support for eliminating ORV damage to the fragile soils, visual resources and significant wildlife habitat.

Fire Management

The Preferred Alternative for the Dubois Badlands Management Unit is full suppression.

Access

The Preferred Alternative would provide for maintenance of the existing transportation system. Present public access is adequate.

Whiskey Mountain Management Unit

The Whiskey Mountain Mountain Unit contains about 4,000 acres of BLM-administered surface, 8,000 acres of federal mineral estate, and 6,000 acres of state and private lands. There are no mining claims on Whiskey Mountain.

Whiskey Mountain is a bighorn sheep crucial winter range managed jointly by the U.S. Forest Service, Wyoming Game and Fish Department, and BLM. The unit has low potential for occurrence of oil and gas and other minerals, and no leases have been issued. A portion of the Whiskey Mountain Unit (500 acres) was also a wilderness study area until December 30, 1982. During the writing of the RMP, the decision to drop this area from further consideration for wilderness was reversed. (For more details on how

PREFERRED ALTERNATIVE

this wilderness issue will be addressed, see Chapter II, Management Actions Common to All Alternatives.)

Energy and Minerals

Oil and Gas

A modified Alternative A was selected as the Preferred Alternative for the Whiskey Mountain Management Unit. The management unit would be designated a no-leasing area for oil and gas. Should drainage occur, the unit would become subject to leasing with a no-surface-occupancy stipulation. There would be no exceptions to the no-surface-occupancy restriction. The segregated acreage could not be leased at all (see map 5-32). Of the 6,630 acres of federal mineral estate within the management unit, 2,599 acres are currently segregated from appropriations under the mineral leasing laws.

The Preferred Alternative would be consistent with cooperative management efforts of the Wyoming Game and Fish Department, U.S. Forest Service and Bureau of Land Management to manage the Whiskey Mountain Bighorn Sheep Winter Range for the purpose of perpetuating the bighorn sheep herd for sport hunting, aesthetics, transplant stock, and educational and scientific values. The overall management strategy, as set forth by this cooperative agreement, implemented in July 1969, is to protect and enhance the value of the range for bighorn sheep and for other values "compatible therewith" in the best interests of the public.

All of the land within the Whiskey Mountain Management Unit has been rated low for the potential occurrence of oil and gas.

Locatable Minerals

The Preferred Alternative for management of the Whiskey Mountain Management Unit is to designate the area as an ACEC (see map 5-34 for the federal surface affected by this designation) and close the Whiskey Mountain Bighorn Sheep Winter Range to locatable mineral exploration and development (see map 5-33).

Of the 6,630 acres of federal mineral estate within the management unit, 2,599 acres are currently segregated from appropriations under the mining laws. Implementation of this alternative would require the withdrawal of all 6,630 acres of federal mineral estate from appropriation under the mining laws (except for oil and gas).

The Preferred Alternative for locatable minerals would be consistent with cooperative management efforts of the Wyoming Game and Fish Department, U.S. Forest Service, and Bureau of Land Management.

Fish and Wildlife

All of the habitat and animal management techniques and improvement projects referred to in this alternative would be initiated for the direct or indirect benefit of the Whiskey Mountain bighorn sheep and their habitat (see Alternative A, Fish and Wildlife, Whiskey Mountain, Appendix I).

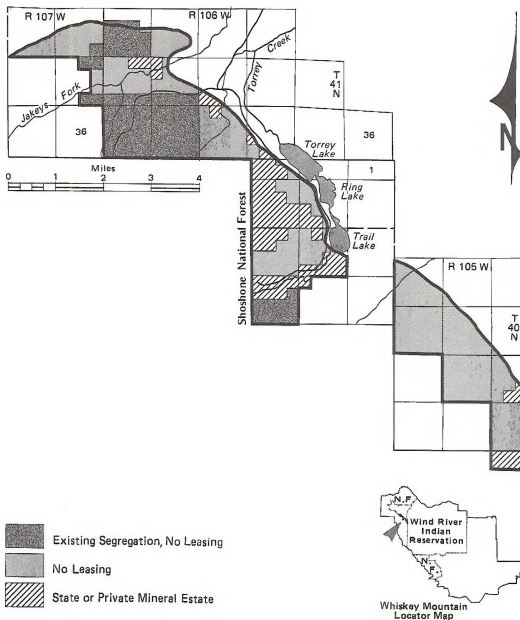
Habitat improvement such as vegetative manipulation or prescribed burning could be used to improve habitat for elk, mule deer or other species, if the purpose were to reduce the competition of these animals with bighorns or if the project would benefit mule deer, elk, etc., without causing significant negative effects on bighorn sheep.

This alternative was selected because it is consistent with the 1969 Interagency Cooperative Agreement, the Whiskey Mountain Bighorn Sheep Comprehensive Management Plan, and the long-standing and established purpose of the Whiskey Mountain Bighorn Sheep Winter Range, all of which emphasize the priority of bighorns and their habitat. Successful implementation of these projects and programs would have significant beneficial effects on bighorn sheep and their habitat.

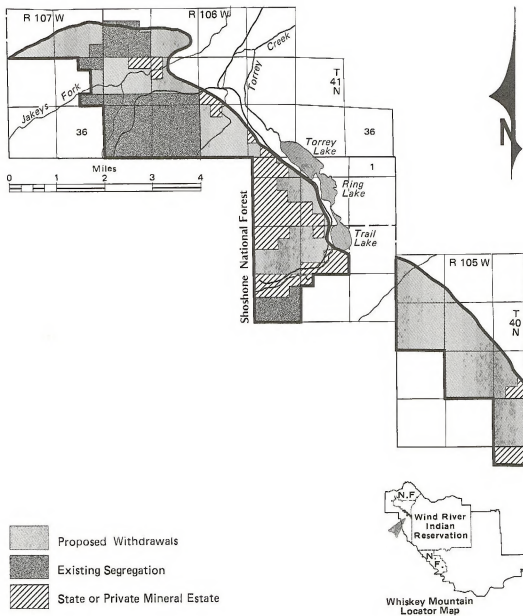
Landownership Adjustments and Utility Systems

The Preferred Alternative is to allow landownership adjustments only when the Bighorn Sheep Interagency Technical Committee has analyzed and recommended such adjustments. The Bighorn Sheep Interagency Technical Committee would take an active role in pursuing and reviewing landownership adjustment options. The rationale for this alternative is that if the two parcels identified for possible disposal (Nos. 38 and 163 totalling 890 acres) were to be disposed of, the end result must be a net benefit to management of the bighorn sheep habitat (see map 5-34).

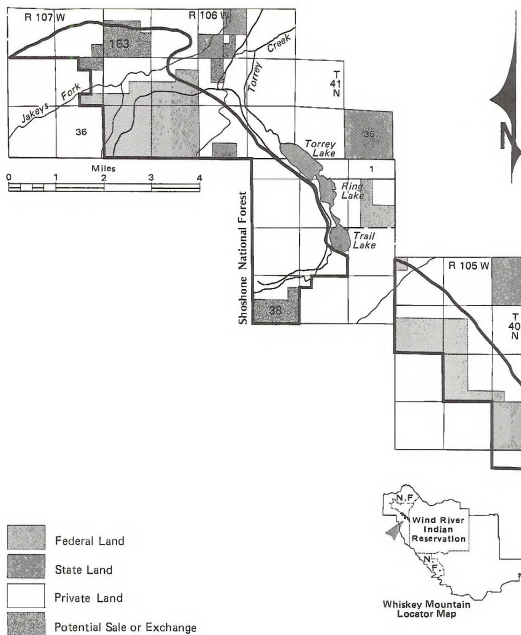
Proposals for sale or exchange received in the future would be considered on a case-by-case



Map 5-32
Oil and Gas Leasing
Whiskey Mountain



Map 5-33
Locatable Minerals
Whiskey Mountain



Map 5-34
Landownership Adjustments
Whiskey Mountain

PREFERRED ALTERNATIVE

basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

The Preferred Alternative also states that Recreation and Public Purpose Act patents will be issued on a case-by-case basis. The rationale for this alternative is that R&PP actions would be analyzed in response to applications, and decisions as to compatibility with the unit's resource values would be considered at that time.

The Preferred Alternative additionally provides for avoiding the management unit when locating major utility systems. Rights-of-way might be granted if no feasible alternative route or designated right-of-way corridor were available. The rationale is that installation and maintenance activities could adversely impact both bighorn sheep and their habitat. The management unit is located quite high on the slopes of the Wind River Mountains in an area not conducive to constructing major utility systems.

Recreation Management

The Preferred Alternative is to cooperate with the Wyoming Game and Fish Department on nonconsumptive wildlife visitor use management, set a 14-day camping limit and exclude commercial hunting camps, which would not be compatible with management of the bighorn sheep herd.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to limit vehicle use to designated roads and vehicle routes and impose seasonal closures in some areas. A few roads would be rehabilitated, while others would remain open for viewing the bighorn sheep.

Long- and short-term resource damage, user access requirements and public safety suggest that limitation of ORV use would be in the best public interest. Roads and vehicle routes should be closed seasonally in order to protect the road-bed, watershed values, visual resources, and wildlife habitat (approximate dates would be from December 1 to June 15). Unnecessary roads would be eliminated to put areas back into production for wildlife habitat.

Fire Management

The Preferred Alternative for the Whiskey Mountain Management Unit is limited suppression. This alternative was selected because heavy equipment used on fires could easily damage the fragile soils on the steep slopes. Also, fires in the area could have the potential for enhancing the sheep habitat.

This prescription is compatible with the present fire policy on adjacent U.S. Forest Service lands.

Access

The Preferred Alternative is to maintain the present transportation system. Legal public access is available to public lands in the Whiskey Mountain Management Unit.

Dubois Area Management Unit

The Dubois Area Management Unit contains about 27,000 acres of BLM-administered surface, 84,000 acres of federal mineral estate, and 103,000 acres of state and private lands.

The Dubois Area Management Unit consists of scattered public lands with potential for occurrence of oil and gas, ranging from mostly low to some moderate and some high. This scenic unit also has important habitats for elk, deer, moose, and antelope.

Energy and Minerals

Oil and Gas

The Preferred Alternative for management of the Dubois Area Management Unit is to keep the entire unit open for oil and gas leasing. New oil and gas leases issued in areas rated as having moderate, low or no potential for the occurrence of oil and gas reserves would include a no-surface-occupancy restriction to protect water quality, fisheries, riparian areas, sage grouse leks, steep slopes, threatened and endangered species, Warm Springs Canyon, the area around Torrey Lake, and significant cultural sites. In addition, seasonal restrictions would be applied to the leases to

PREFERRED ALTERNATIVE

protect important wildlife habitat areas. In areas with moderate, low or no potential for occurrence of oil or gas, restrictions would be applied automatically before lease issuance. These restrictions could be waived later if appropriate. In areas with high potential for the occurrence of oil or gas, including KGSs, restrictions would not be automatically applied before lease issuance. Instead, new oil and gas leases issued in these areas would be conditioned with no-surface-occupancy and seasonal restrictions on a case-by-case basis and only when necessary to avoid a significant adverse impact on another resource. This alternative would further provide for the enhancement of oil and gas development in KGSs and high-potential areas through the waiver of lease restrictions, upon demonstration by the lessee that adverse impacts to other resources could be minimized (see map 5-35).

Implementation of the Preferred Alternative would allow for maximum management flexibility over the full range of resources. In areas of moderate, low and no potential for occurrence of oil and gas, this alternative would allow for enhanced management of the surface resources, while providing opportunities for exploration and development of the oil and gas reserves. Conversely, in areas of high potential for the occurrence of oil and gas or in areas of established production such as KGSs, this alternative would allow for enhanced management of exploration and development activities by minimizing the restrictions imposed on these activities.

Locatable Minerals

The entire unit, with the exception of 190 acres in Warm Spring Canyon, would be open to locatable mineral exploration and development. All exploration and development activities would be regulated in accordance with the regulations set forth in Title 43 CFR Part 3809. Implementation of this alternative would require the withdrawal of 190 acres of federal mineral estate from appropriation under the mining laws (see map 5-36). Because of the limited interest that has been expressed for locatable mineral exploration activities and the relatively low development potential of the area, adequate protection for other resources could be achieved through administration of all exploration and development activities under the regulations contained in Title 43 CFR Part 3809, with the exception of 190 acres in Warm Springs Canyon. Withdrawal of the 190 acres would be consistent with the management objective of protection of the scenic, natural and historical characteristics of the canyon.

Fish and Wildlife

Under the Preferred Alternative, routine fish and wildlife habitat improvement projects and maintenance of existing projects would be completed after appropriate review and would be consistent with program capabilities and priorities.

Forest Management

The Preferred Alternative is to offer small sales if a demand existed. The objective would be to improve the condition of the timber on small areas by regenerating harvested areas. This would be mainly to benefit wildlife habitat in these areas.

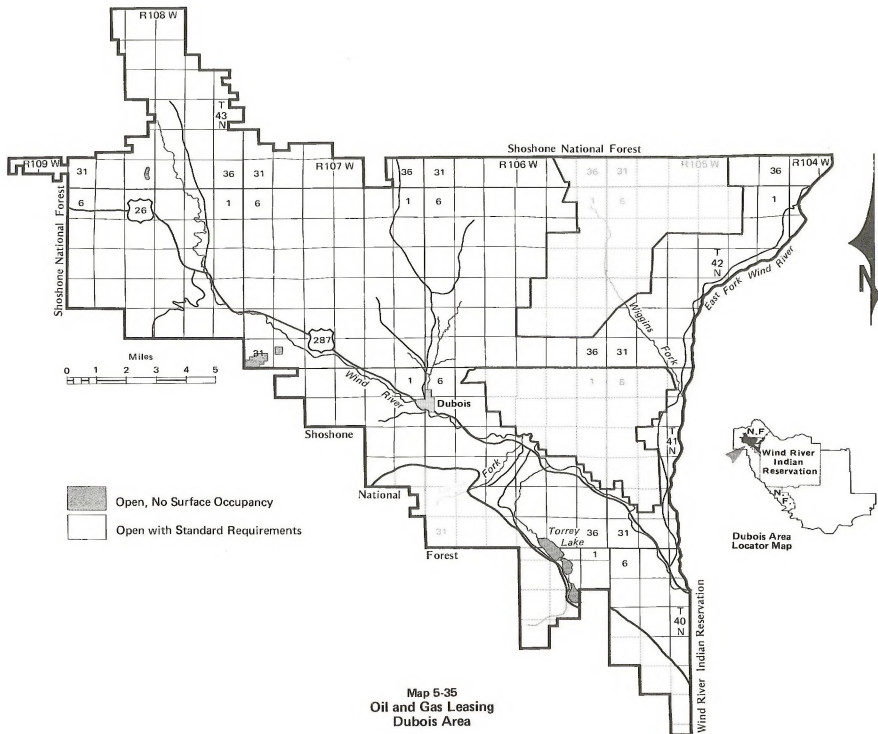
Timber resources in the Dubois Area Management Unit are quite limited; therefore, opportunity for timber harvest is also quite limited. There are only 2,000 acres of timber stands scattered over this area, with the majority in the Sand Butte and Hat Butte areas.

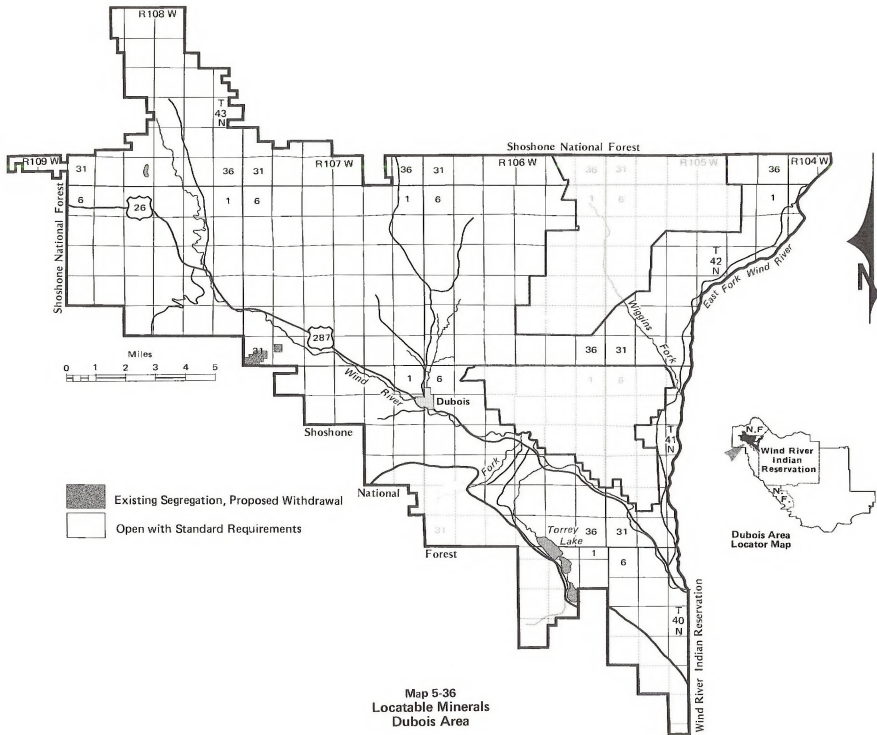
Physical access to the timber stands is difficult because of the rough terrain, but could be accomplished from at least two different directions. Legal access through private lands is lacking; however, this should not be a problem if negotiated sales were utilized.

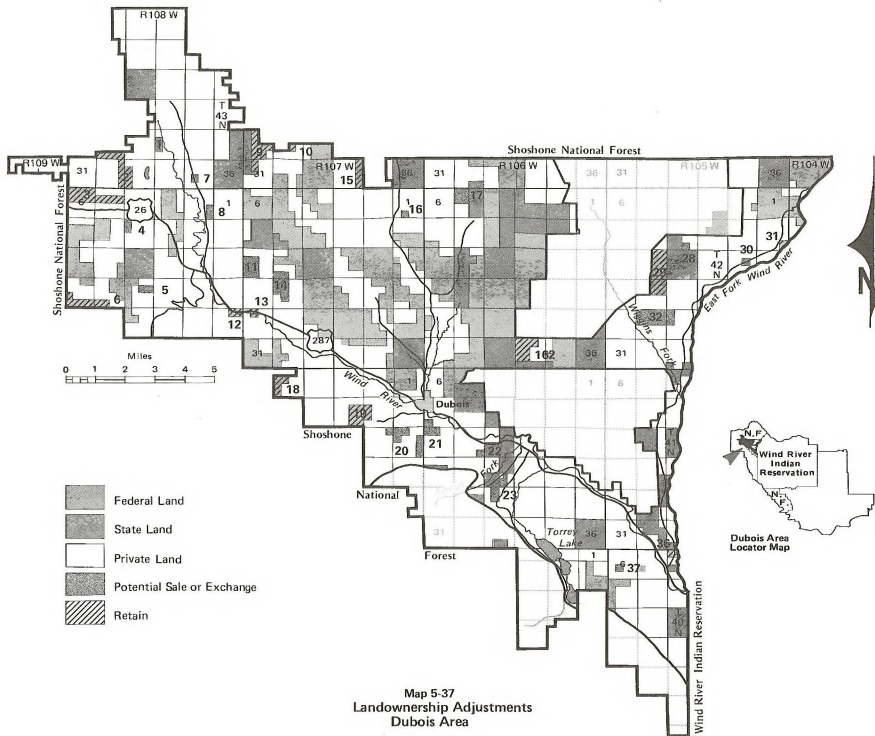
Landownership Adjustments and Utility Systems

The Preferred Alternative is to retain 14 tracts and consider 18 tracts for sale or exchange (see map 5-37). Proposals for disposal or exchange received in the future would be considered on a case-by-case basis. If a certain proposal is determined to be consistent with the objectives of this RMP, it could be approved without preparing a planning amendment.

The 14 tracts, totaling approximately 2,960 acres (tracts 2, 3, 6, 9, 10, 12, 13, 15, 18, 19, 29, 31, 36, and 162) would be retained because of important wildlife habitat and high public recreational values. The other 18 tracts, totaling approximately 2,325 acres (tracts 1, 4, 5, 7, 8, 11, 14, 16, 17, 20, 21, 22, 23, 28, 30, 32, 37, and 168), would be considered for sale or exchange. The rationale for considering disposal of these tracts is that even though they have high wildlife values, there is no legal or physical access to these lands. It is predicted that the wildlife habitat value of these parcels would not be affected if they were







Map 5-37
Landownership Adjustments
Dubois Area

PREFERRED ALTERNATIVE

disposed of, because a change in land use would probably not occur.

Recreation and Public Purpose Act patents would be issued on a case-by-case basis to meet the needs of organizations and local and state governments.

The Preferred Alternative is to allow major utility systems. The systems would be concentrated in existing corridors whenever possible. The rationale is that the potential routes that are suitable for locating major utility systems are located along U.S. Highway 287, county roads, and major drainages. These areas are comprised of predominantly private land, with scattered small parcels of public land that would not be significantly impacted by a major utility system.

Recreation Management

This unit would best be managed consistently with other extensive recreation management area objectives where dispersed recreation would be encouraged and where visitors would have freedom of recreational choice with minimal regulation.

Off-Road Vehicles (ORVs)

The Preferred Alternative is to limit ORV use to existing roads and vehicle routes.

ORV use is limited to existing roads and vehicle routes on most public lands. There is still ample opportunity to leave existing roads to perform necessary tasks, including picking up big game kills, repairing range improvements, managing livestock, and performing mineral activities with minimal surface disturbance.

Cultural/Natural History

The Preferred Alternative for the cultural/natural history resources program in the Dubois Area Management Unit would affect one combined cultural/natural history resource. It would provide for the completion of a management plan for the Warm Springs Canyon flume, following a study of stabilization needs of the flume.

A study detailing the stabilization needs of the flume and an overall management plan for Warm Springs Canyon would begin the process of protecting the important cultural and natural history

resources of the canyon from deterioration. This flume, which is eligible for the National Register, is presently suffering from natural weathering and minor vandalism, but still remains in fair shape overall. Continued neglect of the flume would eventually result in the destruction of this important resource, although it does not appear to be in immediate danger. The natural bridge and geyser are less vulnerable, but still are in some danger of damage from vandalism. For these reasons, a management plan designed to manage the canyon and assess stabilization and protection needs for the flume was chosen.

Fire Management

The Preferred Alternative for this area is full suppression with no equipment restrictions. This entails an aggressive initial attack with all available resources, with the objective of suppressing wildfires as quickly as possible.

The BLM-administered lands in this area are very scattered, with more private and state lands than BLM lands. Full suppression would reduce or eliminate damage to other lands from wildfires starting on BLM lands.

Access

The Preferred Alternative would provide for negotiations with landowners for easements as identified in the District Transportation Plan. As of 1985, this plan calls for negotiating easements for public access on the Tappan Creek Road.

The Tappan Creek Road is not available for public access. The public lands in the management unit are largely land-locked. Easements on this road would provide public access to several hundred acres of public land and would tie into the national forest land. Legal access would provide important access for hunting and sightseeing. This road would be seasonally closed because the area is an important elk migration corridor.

Sweetwater Canyon Management Unit (Wilderness Study Area)

See Lander Wilderness EIS for proposed management of wilderness study area.

PREFERRED ALTERNATIVE

Sweetwater Rocks Management Unit (Wilderness Study Area)

See Lander Wilderness EIS for proposed management of wilderness study area.

Copper Mountain Management Unit (Wilderness Study Area)

See Lander Wilderness EIS for proposed management of wilderness study area.

TABLE OF CONTENTS

CHAPTER VI CONSULTATION AND COORDINATION

INTRODUCTION	459
PUBLIC PARTICIPATION.....	459
CONSISTENCY	459
AGENCIES AND ORGANIZATIONS CONSULTED	460
Federal Agencies	460
State Agencies	460
State Legislators	460
Counties and Cities	460
Congressional Offices.....	460
Indian Tribes	461
DISTRIBUTION	461
LIST OF PREPARERS	461
PUBLIC COMMENTS AND RESPONSES ON THE DRAFT	
ENVIRONMENTAL IMPACT STATEMENT	463

CHAPTER VI

CONSULTATION AND COORDINATION

INTRODUCTION

The Lander RMP/EIS was prepared by an interdisciplinary team of specialists from the Lander Resource Area and the Rawlins District office and the Wyoming State office of BLM. In-depth reviews for accuracy and consistency were provided by both the district office and state office staffs.

Consultation, coordination and public involvement occurred throughout the process through scoping meetings, open house and informal meetings, individual contacts, a newsletter, radio and newspaper releases, and *Federal Register* notices.

Writing of the document began in the fall of 1984. Much of the analysis, research, inventory, public involvement, and interagency coordination was completed before that time.

PUBLIC PARTICIPATION

A public participation plan was prepared to ensure that the public would have numerous opportunities to be actively involved in the planning and environmental processes. Both formal and informal input was encouraged and utilized.

A Federal Register notice of intent to prepare a plan was published in January 1984. A news release on October 24, 1984, announced four open house meetings to be held in November. At the same time, a newsletter requesting public input that outlined planning issues and criteria, was mailed to agencies, organizations and individuals on our mailing list.

The responses received were from many sectors of the public and covered all the issues and proposed management actions. Generally, there was a great deal of interest in the wilderness study areas by both development and preservation-oriented entities and individuals. Many responses dealt with oil and gas, and other mineral issues and concerns not only in the wilderness study areas, but in the other management units as well. There was considerable interest, by ranchers primarily, in the grazing proposals. There were

many comments dealing with wildlife preservation and enhancement, especially regarding habitat in the resource management units near Dubois. There was much interest in recreation-related proposals and in cultural/historical preservation, the latter especially so in the South Pass Management Unit. There was significant interest in possible landownership adjustments, timber and firewood sales, and access to public lands. These concerns were from other federal agencies, state and local government agencies, interest groups (primarily conservation groups), business and industry (primarily mineral industries), and many individuals with varying interests.

The Rawlins District Advisory Council and the Grazing Board were kept apprised of the progress of the RMP and their comments were solicited throughout this process.

Each operator of an I, M, or C category grazing allotment was contacted, either in person or in writing to discuss the categorization of that allotment.

Formal and informal meetings were held with many members of the ranching and minerals communities and with other interest groups and agencies.

The Draft RMP/EIS was released in November 1985. Two public hearings were held in December; one in Dubois and the other in Lander. Comment letters received are found in Chapter VII, together with BLM's responses to each of the concerns raised.

CONSISTENCY

Coordination with other agencies and consistency with other plans was accomplished through continuous communications and cooperative efforts between BLM and involved federal, state, and local agencies and organizations. The Wyoming Governor's Clearinghouse was supplied with numerous copies of the draft document for review to ensure consistency with the state's ongoing plans. We believe we have addressed all the comments from state agencies and that the plan meets the consistency requirements defined in FLPMA. County land use plans were reviewed by the RMP team to ensure consistency.

CONSULTATION AND COORDINATION

Authorities for the Bureau of Indian Affairs from the Wind River Reservation were coordinated with, as was the Bureau of Reclamation for the adjoining Boysen Reservoir project, and the U.S. Forest Service for the adjoining Shoshone National Forest.

Local groups were consulted to ensure that all parties were aware of the plans and objectives. A copy of the newsletter was distributed to all persons on the Lander RMP mailing list. This list is available at the Lander Resource Area office.

Copies of the document are available for review in the BLM offices at Lander, Rawlins, Worland, Casper, and Rock Springs, and in the county libraries in Fremont, Natrona, Sweetwater, and Carbon counties.

AGENCIES AND ORGANIZATIONS CONSULTED

The planning team consulted with; mailed notices or drafts to; and/or received comments from the following organizations during development of the plan:

Federal Agencies:

U.S. Department of the Interior
*U.S. Bureau of Mines
U.S. Geological Survey
Bureau of Reclamation
Bureau of Indian Affairs
Bureau of Land Management (other offices)
*National Park Service
Office of Surface Mining
*Fish and Wildlife Service
U.S. Department of Agriculture
*Forest Service
Soil Conservation Service
*Environmental Protection Agency
Tennessee Valley Authority
U.S. Department of Energy
U.S. Department of Defense
*Department of the Air Force
U.S. Department of Housing and Urban Development
U.S. Department of Commerce
U.S. Department of Transportation

State Agencies:

*Wyoming Office of the Governor
State Planning Coordinators Office
*Game and Fish Department
*Recreation Commission
Highway Department
Public Lands Commission
Public Lands and Farm Loan District
*Public Service Commission
University of Wyoming (various departments)
State Historic Preservation Officer
Central Wyoming College
Archives Museums and Historical Dept.
Department of Environmental Quality
*Geological Survey
*State Engineer's Office
*Oil and Gas Conservation Commission

State Legislators:

Senators and Representatives of Fremont, Carbon, Sweetwater, Hot Springs, Sweetwater, Laramie and Albany Counties

Counties and Cities:

Board of Fremont County Commissioners
Natrona County Commissioners
Carbon County Commissioners
Sweetwater County Commissioners
Hot Springs County Commissioners
City of Lander
City of Riverton
*Town of Dubois
Town of Shoshone
Town of Jeffrey City
Town of Atlantic City
Town of South Pass
Fremont County Planning Commission
Natrona County Weed District
Fremont County Weed District
Fremont County Extension Agent
Fremont County Solid Waste Disposal District

Congressional Offices:

Office of Congressman Cheney
Office of Senator Simpson
Office of Senator Wallop

CONSULTATION AND COORDINATION

Indian Tribes:

Arapahoe Business Council
Shoshone Business Council

*Denotes those agencies/organizations that commented on the Draft RMP/EIS.

DISTRIBUTION

In addition, notices, requests for comments, and copies of the draft document were sent to businesses, organizations, interest groups, and individuals. The mailing list is available at the Rawlins BLM District office or the Lander Resource Area office for review.

LIST OF PREPARERS

Team Leader and Technical Coordinator

Gene Kolkman

Qualifications: Regional Planner and Economist, Bureau of Land Management, 5 years; B.A., Economics, University of Colorado.

Responsibility: Project Management and Technical Coordination.

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Bob Tigner

Qualifications: Natural Resource Specialist, Bureau of Land Management, 4 years; Wildlife Biologist (Research), U.S. Fish and Wildlife Service, 21 years; Ph.D., Biology, University of Colorado; M.S., B.S., Wildlife Management, Colorado State University.

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Responsibility: Economics

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Ken Johnson

Qualifications: Forester, Bureau of Land Management, 11 years; Forester, Bureau of Indian Affairs, 5 years; Forester, private industry, 4 years; B.S., Forestry, University of New Hampshire.

Responsibility: Forestry

Geologist

Fred Georgeson

Qualifications: Geologist, Bureau of Land Management, 11 years; B.S., Geology, University of Wyoming.

Responsibility: Minerals.

Outdoor Recreation Planner

Craig Sorenson

Qualifications: Outdoor Recreation Planner, Bureau of Land Management, 10 years; Park Ranger, Utah State Parks, 1 year; B.S., Forest Recreation, Utah State University.

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CONSULTATION AND COORDINATION

Range Ecology, University of Wyoming.

Responsibility: Wildlife.

Range Conservationists

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Ed Womack, Chief, Minerals, Lander Resource Area

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Bureau of Land Management

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Tina Warren, Printing Technician, Wyoming State Office.

CONSULTATION AND COORDINATION

PUBLIC COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

**TABLE 6-1
COMMENTS RECEIVED**

Assigned Number (in Order of Receipt)	Name of Commenter
1.	Department of Environmental Quality, Sheridan
2.	United States Senate - Pam Redfield, Lander
*3.	Dept. of Air Force
4.	Mark Hughes
5.	Friends of Wild Wyoming Deserts
6.	J. Sanchez
*7.	Graves & Associates, Ltd.
8.	Lance McCold
9.	USDA, Forest Service, Targhee National Forest
10.	Documents Office, University Library, Eastern Michigan University
*11.	Continental Divide Trail Society, James R. Wolf
*12.	Rocky Mountain Oil and Gas Association, Inc.
*13.	True Oil Company
*14.	Oregon-California Trails Association, Thomas H. Hunt
*15.	The Nature Conservancy
*16.	Marathon Oil Company, Casper WY
*17.	Mark Hughes
18.	Richard E. Cooper
*19.	Petroleum Association of Wyoming
*20.	Meredith Taylor
21.	Mary A. Gravitt
22.	William J. Laden
23.	Marcus Jernigan
24.	Larry Murante
25.	Ned W. Stone
26.	Jerry T. Drake
*27.	Duane L. Howe
28.	M. J. Anderson
29.	Jane Denton, D.P.M.; Jeffrey Schneiber, M.D.
30.	Neltje
31.	Lois Wilson
32.	Mari Tustin
33.	Kenneth J. Macklin
34.	Mrs. Anona M. Heimbigner
35.	Nancy L. Russell
36.	Jeff Vaughn
37.	Thieret
38.	T. Russell Mager
39.	Randy and Dierdre Rand
40.	Ron Guenther, Sierra Club, Redwood Chapter
41.	Steven W. Patwell, M.D.
42.	Grace B. Morris, Daniel L. Morris
43.	James B. Breese
44.	Ken Bunch
45.	Rex Mason, Betty Mason
46.	Gary C. Wong
47.	Gertrude Platt
48.	Mrs. H. B. Kuhnle
49.	Lydia Edison
50.	Ola Harrison
51.	Ron P. Good
52.	George Lagomarsino
53.	R. W. Van Alstyne

A total of 629 individuals, private organizations and federal, state and local agencies submitted comments on the recommendations and/or analysis in the Draft Lander RMP/EIS, Draft Grazing Supplement and Draft Wilderness Supplement during the 90 day comment period. Five hundred fifty-two comments were received on the preliminary recommendations regarding wilderness in this RMP. The final recommendations on wilderness will be prepared in conjunction with the Secretary of Interior. The final wilderness EIS, when printed and released for the public protest period, will include responses to the wilderness comments received in this RMP. All comments will be considered by the Secretary when reaching his recommendations. The remaining 60 letters pertained predominantly to the RMP and the Grazing Supplement (some also include wilderness comments, but not as the sole concern). Table 6-1 shows the comment number and the name of the person or organization commenting. The numbers indicate the order in which the comments were received. An asterisk indicates those which were responded to in this document.

Letters 1, 2, 4, 6, 8, 9, 10, 18 and 91 requested information and required no response. The following are the same letter: 96 and 183, answered under 96; 213, 240 and 284, answered under 213; 347 and 348, answered under 347; and 570 and 571, answered under 570.

All comments are printed verbatim. A few handwritten comments have been typed verbatim for better readability. The response to a comment either identifies that a change was made or provides a thank you for your comment.

For ease in identifying the comment source, all written comments received are referred to as letters in this section, whether the comment was in the form of a letter, oral testimony at one of the two public hearings, or multiple signatures on the same letter. Each letter was divided into its major points and each point was assigned a number. Each comment will be referenced to by number.

CONSULTATION AND COORDINATION

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
54.	Gerald R. Brookman
55.	Phillip M. Harmon
56.	Richard A. Strait
57.	Mary Finlayson
58.	Randy Wise
59.	Pat Boomer
60.	Frank Norris
61.	Thomas H. Stone
62.	Sue Lowry
63.	David R. Wallace
64.	Mrs. Gene Anne Parker
65.	Milda Hester
66.	George A. Bridges
67.	Elizabeth Howell
68.	Daphne O'Regan
69.	Dr. and Mrs. Larry Allen & Family
70.	Alex Bennett
71.	Hortense McIver
72.	Anne Model
73.	Carl D. Mitchell
74.	John M. Kuzniak
75.	Priscilla Kezar
76.	Marian Gruenfelder
77.	Jeannette Alosi
78.	Norman Johnson
79.	Alex L. Pugh
80.	Josephine Briggs
81.	Gregory Pais
82.	Mrs. Thomas N. Bowdle
83.	William & Genevieve Sattler
84.	Drummond Mansfield
85.	Neil McMillan
86.	Robert T. Johnson
87.	Thomas Kluk
88.	Irene S. Coburn
89.	John F. Wurzel, Sr., M.D.; Laurie A. Whitlock;
	Sheri Behrens
90.	Wm. B. MacAulay
91.	Rex Zobel
92.	Carl Rouch
93.	Dara Newman-Samuels
94.	Mrs. Andrew Wills
95.	Erwin A. Bauer
96.	Citizens for Multiple Use, James McGuire, Ph.D.
97.	Jennifer Lawson
98.	Edith Olson, Sierra Club Member
99.	Tom Sewell
100.	Allen L. Hammer
101.	Bruce Edwards
102.	Robert & Lynn Siesehnop, James & Sheri Beck
103.	Robert & Lynn Seischnop, James & Sheri Beck
104.	B. Newell
105.	Martin H. Gerber
106.	Sterling Vinson
107.	S. H. Hall
108.	Reed Secord
109.	Robert Zalkin
110.	Joe and Ada Cabell
111.	Dean Diers
112.	M. Boysen

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
113.	Kenille B. Prosser
114.	Alison Hutchings
115.	Maria A. Telesca
116.	Neal Miller, Kathryn Hiestand
117.	George Catalano
118.	Dennis R. Nelson
119.	Thomas Young
120.	Wm. T. Rose
121.	Mary B. Donchez
122.	Gerald L. Boomer
123.	Elliott Bernshaw
124.	Harold A. Keelen, Jr.
125.	Edgar E. Hancock
126.	Joaquim Panozzo
127.	Scott Schulke
128.	David S. Gussman
129.	Joan J. McCrory
130.	Tennessee Wilderness Action Council, Kenneth S. Warren
131.	Abraham Wilensky
132.	Richard G. Cook
133.	Linda and Bill Alexander
134.	R. Saigh
135.	R. Craig Stotts
136.	John Canfield, M.D.
137.	Rhea Moss
138.	John Pamperin
139.	David H. Hepler
140.	Laura Pare, M.D. and Ralph Delfino
141.	Beverly Fogelman
142.	Elizabeth Heesteed
143.	Helen Scull
144.	Joe Brandl
145.	Sidney M. Hirsh
146.	Jeffrey R. Foster, Sierra Club, Wyoming Chapter, Snowy Range Group
147.	Wm. J. Sander
148.	Celia Lindblom
149.	Thomas J. Messenger
150.	Kurt O. Otley
151.	Leonard J. Choate
152.	Ann Fisk
153.	Dorene D. Johnston
154.	Donald J. Walsh
155.	Thomas H. Grisham, M.D.
156.	Helen A. Newhouse
157.	Steve Warble
158.	Kirk W. Genger
159.	Thomas W. Giblin, Jr.
160.	Ruth M. Loeffelbein
161.	Gerald Ottone
162.	Mark S. Galley
163.	Dr. Mike and Rae Newman
164.	Nancy L. Nesewich
165.	Olga M. Rosche
166.	Max Zischkale, Jr.
167.	Randy E. Holder
168.	Tony Chambers
169.	Thomas Ribe
170.	Charles H. Ellis III

CONSULTATION AND COORDINATION

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
171.	Anna M. Koval
172.	Joel Goldstein
173.	Stephen W. Keith
174.	Richard C. Wilson
175.	Jack S. and Joshua Groff
*176.	Gary J. Keimig
177.	Leonard Burkhardt
178.	Ken Berlan
179.	Joseph Lee Boyle
180.	Tina Gregory
181.	Robert Mosman
182.	Jack Hinrichs
183.	Citizens for Multiple Use, James McGuire
184.	Bruce Hamilton
185.	John M. Chaplick
186.	Joseph R. Hunkins, Kathryn A. Holden
187.	Jim Wilson
188.	Charles E. Axthelm
189.	Ernest W. Mueller
190.	Erika Schnurmman
191.	Eleanor P. and Dennis J. Fleming
192.	Thomas A. Bliss
193.	Nancy Gingrich, Sherrill Lorio, Gwendolyn Boudreaux
194.	Bob Hoffman
195.	Richard Hiers
196.	Walter and Dorothy Pelech
197.	John B. Lund
198.	Rosemary Michalec
199.	Timothy W. Pemberton
200.	Mark Gooding
201.	Barbara R. Hume
202.	Thomas G. Eick
203.	Lois O. Ormand
204.	David Clarendon
205.	Joseph D. O'Neill
206.	Fred K. Gray
207.	Ted Rosa
208.	Donald Purinton
209.	Marian Fox
210.	Robert G. and John D. Hill
211.	Joyce Holmes
212.	Kevin Fernlund
*213.	Mr. & Mrs. Bill Hancock
214.	Rima Freid, Ph.D.
215.	Robert F. Bucknam
*216.	John R. Swanson
217.	Steve Kuchera
218.	Paul J. Conn, Dorothy J. Boulton
219.	George Reynolds
220.	John D. Story
221.	Parker Land & Cattle Co., John Story
222.	Hazel Koehler
223.	Robert Markeloff
224.	Robert Kravich
225.	Joan Tockstein
226.	Stephen Becker
227.	Virginia Bucknam
*228.	Mike Massie, Wyoming Chapter Sierra Club
229.	Angus Brown

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
*230.	Dan Moore
231.	Rebekah Johnson
232.	Lawrence A. Papp
233.	Dexter Perkins
234.	Jim Allard
235.	Andrew Graham
236.	John E. Earl
237.	Betty Follis
238.	Mrs. Fannie Lee Ford
239.	Iola Jokoboski
240.	Bill Hancock
241.	Gregory J. Hickey
242.	Jim Moore
243.	Joseph C. Palladino
244.	Gary Martin
245.	Clyde A. Ray
246.	Joseph L. Malek
247.	John Holdaway
248.	Dwight Sempter
249.	Mike Ibach
250.	Charles S. Tubman
251.	Larry Christensen
252.	Tom G. Massey, Sr.
253.	L. R. Ego
254.	Trinidad Herrera
255.	Dallas G. Bissell
256.	Gary Stover
257.	Diana Currah
258.	Tom Outland
259.	Lanny Applegate
260.	Ken Rhoads
261.	Don McOmie
262.	Robert A. Stanker
263.	Robert R. Dahlstedt
264.	Hollis Marriott
265.	Barbara A. Speyer
266.	Myrtle Shanor
267.	Ray Shanor
268.	E. Ralph McCall
269.	Sara Traum
270.	Betty L. Starratt
271.	Rev. Gilbert B. Moore
272.	Trudy Smiley
273.	Elizabeth H. Moore
274.	Graves & Associates, Ltd.
275.	City of Riverton, James D. Soumas, Mayor
276.	Patricia Moore
277.	Ken Driese
278.	Celia Scott-Von der Muhll
279.	The Olsen Family
280.	Dan Chatfield
281.	Randy Lehman
282.	D. Mark Parr
283.	Caren Zimmern
284.	Wm. Hancock
*285.	Wm. G. King
*286.	Tory Taylor
287.	John and Gladys Weber
288.	Orley Pitt
289.	Dennis Davison

CONSULTATION AND COORDINATION

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
*290.	Dorothy Davison
*291.	Bill Lowe
292.	Alice L. Gustin
293.	Melvin E. Gustin
*294.	National Audubon Society, Margaret L. Abbott
295.	Wind River Multiple Use Advocates, Wm. G. King
*296.	Amoco Production Company, R. L. Anderson
*297.	Wyoming Outdoor Council, Robert L. Means
*298.	Wyoming Wood Products, Patrick C. Hickerson
299.	Connie Clauson-Pearce
300.	E. O. Sowerwine, Jr.
301.	Sharon Chumley
302.	Jim Chumley
303.	Gerda Mansell
304.	Monroe Harvey
305.	Peggy Bartlett
*306.	L. Cowling
307.	Joyce Pickett
308.	Mrs. Barbara M. Stroh
309.	Kenneth L. Stroh
310.	Maryann Blackerby
311.	Janet Carruthers Lashly
312.	Mark A. Hickerson
313.	Martie Crone
314.	Mary Sucharda
315.	Dennis Hining
316.	Wind River Multiple Use Advocates, Edward B. Young
317.	Wind River Multiple Use Advocates, Edith Young
*318.	Michael J. Kenney
319.	Sherry & Weldon Shelley
320.	Ernest Wilson
321.	Vannis D. Parkhurst
322.	Mark Derichsweller
323.	J. M. Walkenhorst
324.	Elisabeth J. Lamback
325.	Robert O. and Ruth W. Zeller
326.	J. L. Wyatt
327.	State of Washington, Dept. of Game, Olympia, Washington
328.	R. E. Peterson II
329.	Ronald P. Lewis
330.	John Sargent
331.	Eric A. Gieschner
332.	Mrs. Catherine Gibbs
333.	Bruce J. Noble, Jr.
334.	W. A. and Mary Svoboda
335.	Max T. Evans
336.	Sharon and Bob Campbell
337.	Lee W. McRae
338.	Shawn D. McRae
339.	Nell O. Miller, Jennifer S. Miller
340.	Cal Hancock
341.	Donald A. Smith
342.	Helen & H. Thomas Weisz
343.	Sharon E. Dooley
*344.	Tecia Hubble
*345.	Devin Hubble
*346.	Fremont County Audubon, Charles H. Nations

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
*347.	Table Mtn. Ranch, David R. Raynolds
348.	Table Mtn. Ranch, David R. Raynolds
349.	Curtis Syme, Donald R. Johnston, Carol J. Moore
*350.	George Newbury et al.
351.	Fred Cox et al.
352.	Michelle Gunsaulus
353.	Don Gunsaulus
354.	Vera Gunsaulus
355.	Frank Gunsaulus
356.	Robert C. Peterson
357.	John L. Larsen
358.	Rob Kindle
359.	Ina Baker
360.	Lander Area Chamber of Commerce, Linda Van Fleet
361.	Norman Leicester
362.	Paul Davidson
363.	Mark Miller
364.	Janice Bergstrom
365.	Brian Martinsen
366.	Tom Heili
367.	Jerome T. Bergstrom
368.	L. M. Chiple
369.	Scott Small
370.	P. Tutton
371.	Tom Freed
372.	Dave Small, Jr.
373.	Sandy Small
374.	Gary M. Carroll
375.	Ronald G. Glasscock
376.	Vickie Garcia
377.	Alan L. McOmie
378.	Daniel C. Wyrick
379.	Christine Rushing
380.	Duane R. Kaiser
381.	William L. Bregar
382.	Norman L. Tutton
383.	Kathy Majdic
384.	Kay Feutz
385.	Cindy Hale
386.	Carol L. Boyd
387.	Frank Madewell
388.	Ethel Tutton
389.	Leon Atwood
390.	G. Mike McDonald
391.	Judy K. Sutt
392.	Larry Sutt
393.	Kody Hilpp
394.	Dave Tafoya
395.	Diane Atwood
396.	Vicki Metzger
397.	Kathy Lacy
398.	Bud Sinclair
399.	Lyn Sinclair
400.	Moline C. Kisor
401.	Mark Newton
402.	Duane Clubb
403.	Frank S. Reed
404.	Don Metzger

CONSULTATION AND COORDINATION

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
405.	George L. Patik
406.	Gerald Applehans
407.	Dan Shatto
408.	Wilbert & Nancy Weitzel
409.	Robert Ceorle
410.	Patricia E. Carr
411.	Terry K. Thompson
412.	Don Kramer
413.	Mr. and Mrs. Mark Keiser
414.	Charlotte Wentworth
415.	Jarold W. LaDouceur
416.	Don Jacobs
417.	Jack Weger
418.	James W. Gibson
419.	Melba R. Gibson
420.	Earl W. Smith
421.	Betty Sable
422.	Chad Sable
423.	Jack Armstrong
424.	Priscilla Herbst
425.	Cortni Sable
426.	Maryann Rathbone
427.	Ken Rathbone
428.	Rudy Herbst
429.	Jim Sable
430.	Henry J. Hudspeth, Jr.
431.	Elaine Hudspeth
432.	Alice O. Freese
433.	George Hornecker
434.	Mrs. George Hornecker
435.	Sidney Freese
436.	Eileen Milburn
437.	Robert Milburn
438.	Shawn McRae
439.	Martha McRae
440.	Steve Brown
441.	Cyd Freese
442.	Alfred and Virginia Lindell
443.	Bud Carpenter
444.	Betty Weger
445.	Norman Cronk
446.	Gladys Felix
447.	Wilson J. Felix
448.	Shannon Dickinson
449.	Terri Edwards
450.	Denise R. Nelson
451.	Bill Hirasawa
452.	Bill and Cyd Freese
453.	Don Calhoun
454.	Jerry Alexander
455.	Donald Davison
456.	Tracy Davison
457.	Wendy Minemyer
458.	Mary F. Alexander
459.	Janet Pichard
460.	Tahna Balzly
461.	Ruby C. Herman
462.	Clydene R. Allen
463.	Glen E. Herman
464.	Angela V. Davey

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
465.	Nancy Corbett
466.	Michael S. Tutton
467.	Jim Waters
468.	Tammi Tutton
469.	Debby Metzger
470.	Don Metzger
471.	Darin Raymond
472.	Bill Heninger
473.	Donna Applegate
474.	Keith Bieber
475.	Chris Peterson
476.	Laurel Christensen
477.	Elton D. Martin
478.	Ken Jones
479.	Colleen A. Martin
480.	Viola Wickstrom
481.	Sandy Siwik
482.	James Siwik
483.	Richard Davey
484.	Mike Larsen
485.	Tom Lucas
486.	George Lucas
487.	Karley Watt
488.	Jeanne Larsen
489.	Linda Van Fleet
490.	Jeff Palmemo
491.	Billie Dutcher
492.	E. G. Macfarlane
493.	Ron Given
494.	Mervin Thompson
495.	Don Hundley, Jr.
496.	Thomas R. Jeffres
497.	Dale Jacob
498.	Lowell A. Morfeld
499.	James L. Hubble
500.	Nancy Van Fleet
501.	Robert Van Fleet
502.	Mavis Hubble
503.	Molly Browall
504.	Wendell V. Shields
505.	Lewis B. Diehl
506.	C. Jack Minter
507.	W. L. Taylor
508.	Donald C. Clausen
509.	Thomas J. Cooper
510.	Richard Cooper
511.	Mike McRann
512.	Pat Cooper
513.	Darel L. Wentworth
514.	Karla J. Cooper
515.	Irene Bernier
516.	Lynn McRann
517.	Hugh McRae
518.	Mary F. Herbst
519.	Dorothy Hill
520.	Leslie Wilson
521.	Brigida Guymon
522.	Becky Downs
523.	Aaron Shatto
524.	Roy Trimmer

CONSULTATION AND COORDINATION

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
525.	Donald E. Reed
526.	Lee Parrill
527.	John E. Murphy
528.	Florence Faulkner
529.	Charlene Seely
530.	Gerald Moats
531.	Lee W. McRae
532.	Millie Rhoads
*533.	Town of Dubois, Danny F. Grubb
*534.	Glenda Stewart
535.	Sierra Club, Public Lands Committee, James M. Baker
*536.	Dubois Wildlife Association, Duane L. Howe
*537.	Wyoming Wildlife Federation, Chris H. Peterson
*538.	National Wildlife Federation, David Alberswerth
*539.	USDI, Fish and Wildlife Service, Arthur Andersen
540.	Christopher S. Cockey
541.	Mary Kleinert
542.	Gerald Haslam
543.	Susan C. MacGillis
544.	Katherine A. Gagne
545.	Paul C. Bosch, Pamela R. Bosch, Leslie A. Rogers
546.	Charlie McIntosh
547.	Alison Gieschner
*548.	Chevron USA, Inc. M. M. (Lisa) Flesche
549.	Alan Carlton
550.	Jim McCann
551.	Connie Wilbert
552.	John E. Mikkelsen
553.	Alan Sweger
554.	Richard E. Cooper
555.	Maureen Lindh Carter, Paul Carter
556.	Tom and Virginia Angenent
557.	Robert W. Graves
558.	Ken Berg
559.	Rudolph Sucharda
560.	Jim Minick
*561.	George D. Langstaff
*562.	State of Wyoming, Office of the Governor
*563.	State of Wyoming, Game and Fish Dept.
*564.	State of Wyoming, State Engineer's Office
*565.	The Geological Survey of Wyoming
*566.	The Geological Survey of Wyoming
*567.	State of Wyoming, Oil and Gas Conservation Commission
*568.	Wyoming State Archives, Museums, and Historical Dept.
*569.	State of Wyoming, Office of the Governor
*570.	State of Wyoming, Wyoming Recreation Commission
571.	State of Wyoming, Wyoming Recreation Commission
*572.	State of Wyoming, Public Service Commission
573.	Barbara K. Girdler
574.	Rosa McCann
*575.	W.S.G.B., Dick Loper

TABLE 6-1 (Continued)
COMMENTS RECEIVED

Assigned Number (In Order of Receipt)	Name of Commenter
576.	James V. Lewis
*577.	The Wilderness Society, Northern Rockies Region, Jane Leesen
578.	Bernard Sun
579.	Tom Sun
580.	Noeline Sun
581.	Jim and Shirley Baker
582.	Mr. and Mrs. Richard Burke
583.	Joe E. McIntosh, Jennifer McIntosh
584.	Wm. M. McIntosh
585.	Barbara H. Trought
586.	Frank Traficante
587.	Michael and Constance Schmotzer
588.	Dennis H. Sun
*589.	USEPA, Dale Vodehnal
590.	Harriett McIntosh
591.	James M. Graham, Nadine A. Graham
592.	Collins Jamernan
593.	Tom and Marjorie Graham
594.	Thomas E. Murphree, D'Arlyn Murphree
595.	Albert Myers
596.	Doug Thompson
597.	Jack Corbett
598.	Brenda K. Harms
599.	Ray Vaughn
600.	Steve Champoux
601.	Thomas Gregory
602.	Tim DiChiara
603.	Norman Park, Gaynell Park
604.	Pete Welba
605.	Marjorie Graham
606.	Deborah L. Derbish et al.
607.	Chuck Mott, et al.
608.	Leo Larson, et al.
609.	Fred E. Erickson, et al.
*610.	Lynn Kinter
*611.	Friends of Wild Wyoming Deserts
612.	Jean M.B. Genasci and James E. Genasci
*613.	Wyoming Farm Bureau
614.	R. A. Rosenberg
615.	Matt McWenle
616.	Dan Ritter
617.	Robert F. Mueller
618.	Caroline Yorke
619.	M. Skov
620.	Stephen B. Johnson
621.	Brian Suderman
622.	Holly Jensen
623.	David Barron
624.	Timothy Rockhold
*625.	USFS, Shoshone National Forest
626.	Bradley L. Young
627.	Nathan Borson
628.	Theresa Neske
*629.	Advisory Council on Historic Preservation

*Indicates those comments which were responded to in this document.

3



DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75202

19 NOV 1985

Mr. Wilbur A. Olson, State Director
Wyoming State Office, Rm
P.O. Box 1818
Cheyenne, Wyoming 82003

Dear Mr. Olson:

1

Thank you for allowing us the opportunity to review the Draft Environmental Impact Statement, Resource Management Plan, Grazing Supplement and Wilderness Supplement for the Lander Resource Area, Wyoming.

We continue to express our support of the RMP in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the management of future military flight training areas and routes which may traverse these areas.

Currently no Air Force air operations traverse any portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntner, (214) 767-8514, or PDS 743-2514.

Sincerely,

Richard H. Bruntner
RICHARD H. BRUNTER, Major, USAF
Director, Environmental Planning Division

CY to: HQ USAF/LEEN

Response to Letter 3

1. Thank you for your comments. Although the plan does not address all potential land-use proposals since they were not issues, that does not preclude considering them on a case-by-case basis.

7

GRAVES & ASSOCIATES, LIMITED

INDEPENDENT CONSULTING GEOLOGISTS
P. O. BOX 1885
RIVERTON, WYOMING 82501
(307) 551-7888

December 10, 1985

Jack Welley
Lander Resource Area Manager
P.O. Box 189
Lander, Wyoming 82520

Dear Sir:

1

We, at this office, are of the opinion that any so called management plan proposed by you or any private interest groups which exceeds the pre-1970 multiple land use concepts is of no value, and constitutes a blatant misuse of public funds. The makeup of the Wind River Mountains will remain the same, regardless of any decisions you make, or attitudes you apply.

It is absolutely ridiculous that you even consider not fixing a road or trail that already exists (the Union Pass trail). It is more preposterous to think that you can predict land needs 30 years from now. Aesthetic needs are one thing, but basic needs for survival of the local residents, quite another.

We are opposed to any decision which does not fully consider the possible expansion of timber production, agricultural activities or mineral prospecting and production. Animals have learned to live with Wyomingites, why can't the elite tourists?

Sincerely,

William H. Graves
William H. Graves

WG/bg

P.S. Why is not Riverton ever considered as a locality for sale of your hearings. Any decision regarding future activities in the Wind River Mountains is of basic importance to this community.

Response to Letter 7

1. Thank you for your comment, your concerns have been noted.

Continental Divide Trail Society

P.O. BOX 2002

BETHESDA, MD 20814

December 26, 1985

Mr. Jack Kelly
Lander Resource Area Manager
P.O. Box 959
Lander, Wyoming 82500

Dear Mr. Kelly:

The Continental Divide Trail Society takes strong exception to the plans of the Bureau of Land Management, as summarized at pages 13-21 of the Draft Resource Management Plan for the Lander Resource Area, with respect to the Continental Divide National Scenic Trail.

The failure to plan for a specific CDNT route is contrary to both the National Trails System Act, as amended, and the draft Comprehensive Management Plan for the CDNT. The Secretary of Agriculture is obligated to select rights-of-way for the Trail, with agreement of the Secretary of the Interior concerning the location of the Trail on lands under his jurisdiction. 16 USC 1212(a)(2). The abdication of BLM's responsibility to cooperate in the selection of rights-of-way must be remedied.

We understand that location of the Trail in the Lander Resource Area represents a challenge. A careful examination of the situation should reveal, however, that very good locations can be identified which - with very few exceptions - would be on existing public (or State) lands or rights-of-way. Where lands are privately held, cooperative arrangements should be explored. Another possibility would be the acquisition of interests in land by donation, purchase, or exchange, pursuant to 16 USC 1212 (a), (f), and (g). With regard to exchanges, we suggest that so long as the estates were of approximately equal value, the United States could convey a fee or lesser interest in identified lands in exchange for a right-of-way limited to national scenic trail use, that would give protection to the recreational values recognized by Congress. We appreciate that the limitation on expenditures (16 USC 1212) previously constrains BLM's authority to purchase lands with appropriated funds, but other avenues - cooperative arrangements, exchanges, management of activities by State or local governments - are available.

There is no point whatsoever in identifying the geographic Continental Divide as a Type 3 (that does "type 3" mean?) Recreation Management Area, as indicated on Map 3-27 at least not for scenic trail purposes. There should be a recreation management area - and a recreation management plan - but it should relate to a trail location identified in accordance with law. Maps 3-29 (Visual Resource Management) and 3-31 (Scenery Quality Classes) are revealing in this connection. What they imply is that the Continental Divide itself does not display the high degree of scenic merit that is available a few miles to its north. This is also quite at Map 3-31. What it shows is a nearly continuous line of Class A and Class B country that is an obvious candidate for CDNT routing.

Mr. Jack Kelly

- 2 -

December 26, 1985

Not only would this afford scenic rewards - notably in Sweetwater Canyon and in the Green Mountain area - but it would also capture the historic echoes of the fur trade (open grove campsites), the South Pass Mining Area, and the earliest trails as well.

Remember: a national scenic trail must be located so as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the esthetically scenic, historic, natural, or cultural qualities of the areas through which it may pass. 16 USC 1212(a)(2). The representation of canyon areas is especially desirable. Yikes, BLM must make a conscientious effort to follow this mandate. The draft plan fails to do so.

Where do we go from here? The plan must be revised to provide for a further planning activity - involving full consultation with all interested parties in accordance with 16 USC 1212(a)(2) - to identify a location suitable for designation pursuant to law. The short-term goal should be to identify the best route that can practicably be agreed with reasonable partners. Existing primitive roads can be used in some places. (As a longer-range objective, adjustments should be initiated "to preserve the purposes for which the trail was established." 16 USC 1212(b).) The route, when identified, should be managed in accordance with a resource management plan for the CDNT recreation management area, and that in turn ought to adhere to the provisions of the National Trails System Act and the Comprehensive Management Plan. Certainly, motor touring should not be regarded as a "primary recreation activity" of the Continental Divide National Scenic Trail (See Table 3-15). Alternatives for BMA management should be considered, along the lines of Table 3-1.

We are rather surprised by the nonappearance of trail-related entries in the Glossary and References Cited. Although it need not show up in the bibliography, our links to the Continental Divide Trail, V.3 Wynand merits more attention than it appears to have received in your planning process. It would be a useful starting point for your own studies. We are not proposing that the route described in the guidebook should be the selected right-of-way for the CDNT. We look forward, rather, to exchanging views with you and others over the coming months, and perhaps years, to move the CDNT ahead in an orderly way, in the manner envisaged by law.

Please include these comments in the record for the Draft Resource Management Plan. We intend to submit separate comments on the Wilderness Supplement.

Sincerely yours,

James E. Wolf
James E. Wolf
Director

Response to Letter 11

1. Thank you for your comments. The plan has been changed to reference the final comprehensive plan guidance which was completed in 1985.

Trail route and location will be addressed in a trail management plan to be prepared in the future using the guidance in the comprehensive plan and the National Scenic Trail legislation.

2. The document has been changed to reflect your suggestion to delete motor touring as a "primary recreation activity" of the CDNST as you suggested.



December 26, 1989

Mr. Jack Kelly
Lander Resource Area Manager
P.O. Box 589
Lander, Wyoming 82520

Dear Mr. Kelly:

Thank you for your invitation to submit comments on the draft resource management plan for the Sweetwater Canyon WMA, as presented in the Wilderness Supplement. We offer the following, for incorporation in the record.

The plan correctly recognizes the important historical resources in addition to other scenic and recreational values of Sweetwater Canyon. We would have included references to the accounts of Fremont and Stansbury (as cited in our Guide to the Continental Divide Trail, vol. 3; Wyoming, pp. 129-130). Nevertheless, it is clear that measures need to be taken to preserve the canyon in its natural state.

We ordinarily give wilderness designation, because it provides the greatest protection of eligible lands. We have a reservation in this case, however, stemming from a provision of the BLM Wilderness Management Policy. Section III.A.2.b.(3) states that heavily used areas should be bypassed by primary trails. It is not clear how this provision should be construed (what are "primary trails" and what are "heavily used areas," and what flexibility is implied by the use of the word "should"?). We are concerned about this because the Continental Divide National Scenic Trail may be located in the region. While this would necessitate no new treadway construction, it could conceivably be regarded as a "primary trail" even in its present physical condition.

It is no answer to say that BLM plans no trail designation for the GDT. In our companion letter to you of this date on the plan as a whole, incorporated herein by reference, we emphasize BLM's obligation to engage in a route selection process. A failure to consider the impacts of wilderness designation upon options for location of the GDT would not comport with NEPA.

Accordingly, it is our view that the Wilderness Supplement must be revised to reflect any differences which adoption of one alternative or another might have upon the capability of a route along the bottom of Sweetwater Canyon to be designated as a part of the Continental Divide National Scenic Trail. If you conclude that wilderness designation could be an obstacle to such designation - a conclusion to which we would take exception - then it would be preferable to adopt Alternative 1, the existing management proposal for an ACED.

Please let us know if you have any question regarding these comments.

Sincerely,
James R. Wolf
James R. Wolf
Director

Rocky Mountain
Oil & Gas Association, Inc.

Mr. Jack Kelly
Area Manager
Lender Resource Area
Bureau of Land Management
P. O. Box 589
Lander, WY 82520

Dear Mr. Kelly:

I am writing on behalf of the Rocky Mountain Oil & Gas Association (SMOGA), to offer our comments on the proposed Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS) for the Greater Yellowstone RMP. SMOGA is a trade association which represents outcrops of members, large and small, and accounts for more than 95% of the oil and gas exploration, production and transportation activities in the Rocky Mountain states. For this reason, our members have a vital interest in how the Bureau manages its lands, particularly with respect to mineral activities.

First, we would like to emphasize our support of the RIM's philosophy that energy and mineral resources should be integrated into the land management planning process on an equal basis with other resources. We further support this philosophy in terms of giving energy and mineral activities high priority in areas which have significant potential for exploration and development. It is important to realize the positive consequences oil and gas exploration and production have on socio-economic factors. Aside from adding revenues to local, state and federal governments, these activities have positive effects in terms of more jobs and community development.

With some minor modifications to the lead management proposal, we could support the BLM's Preferred Management Alternative D. We are primarily supportive of this alternative because it affords mineral resources the same priority consideration afforded all other resource values. While this proposal may be considered a "best of all worlds" approach, we believe that the approach is a wise one inasmuch as it clearly states that those areas which require special safeguarding from possibly harmful activities are provided full protection against adverse impacts. Yet, if industry can show that oil and gas activities can be conducted in a manner which does not adversely affect the environment, the BLM is prepared to waive these restrictions on a case-by-case basis.

Alice L. Proff
Lynn Swanson348 PETROLEUM ENGINEERING • DENVER, COLORADO 80202
303/634-8281

January 7, 1969

Response to Letter 12

1. Table 4-1, in Chapter IV, Environmental Consequences, shows the percent of total high potential and moderate potential "acresages" for each of the management units of the Lander Resource Area and shows the percent of total wells drilled through 1984. The table does not show how many wells were drilled in high and moderate potential areas. Table 3-3 titled Lander Resource Area Oil and Gas Well Statistics, actually shows the number of wells drilled in Known Geologic Structures (KGSs), high, moderate, and low potential areas. A total of 2,455 wells have been drilled and 288 of this total, or 11 percent, were drilled in moderate potential areas. Considering this lower percentage as compared to KGSs and high potential areas and the percentage (78) of wells drilled, we don't see a large advantage in treating moderate areas the same as high. However, the Preferred Alternative for leases in moderate potential areas would be conditioned with restrictions where needed.

January 7, 1986

Mr. Jack Kelly
Area Manager
Lander Resource Area
Bureau of Land Management
page two

This approach seems only reasonable since to conduct industry with the opportunity to devise new ways in which to conduct its operations. New technology may be developed which would improve how industry operates in sensitive areas. When industry is constrained to operate in a rigidly specific manner, there is minimal opportunity to develop new methods. Performance standards, rather than design standards, provide for more flexibility, thereby encouraging new ideas on how to mitigate adverse impacts.

The RLM has gone to great lengths to compile and analyze resource data for the RMP in terms of assessing resources and possible environmental consequences which would result from various activities. The RLM has indicated that certain tradeoffs were made between energy and mineral resources and sensitive environmental values, but only where the mineral potential was considered significant enough to warrant such consideration. Even so, when a potentially significant resource exists in an area with high potential, the RLM is committed to protecting this resource in a reasonable manner and in accordance with existing laws governing such activities.

We believe, however, that the RLM should modify this standard to include areas rated as having moderate potential for oil and gas. According to Table 4-1, Percent of Total Wells Drilled, . . . , of the 191 of the Proposed Plan, it is apparent that nearly as many wells are drilled in areas considered to have moderate potential as those drilled in high potential areas. These statistics indicate that the moderate areas are just as important in terms of oil and gas exploration and potential discoveries as are the high potential areas. The rationale for adding more severe constraints to these areas is lacking. Instead of merely considering the potential of an area, the level of activities and mineral interest should also be included in the determinations as to appropriate stipulations to be applied.

We do not support the RLM's decision regarding wilderness recommendations. The RLM has determined that the Sweetwater Canyon Wilderness Study Area is suitable for wilderness. However, it seems unreasonable that the RLM has chosen to recommend as wilderness an area covered with oil and gas leases. The wilderness study policy provides a specific list of criteria by which these decisions are made. These include ecological diversity and balancing the geographic distribution of wilderness areas, providing direct and indirect benefits to all areas of wilderness, and has reasonable access to such areas. Therefore, additional wilderness considerations must be weighed particularly in conjunction with other resource needs and uses. The fact that five of the six miles in the Lander RLA do not meet the established wilderness criteria is justification enough for not recommending them as wilderness. However, we believe it is irresponsible to recommend additional wilderness just for the sake of creating more wilderness. If the Sweetwater Canyon Well, covered with oil and gas leases, were to be designated as wilderness, rights of leaseholders to explore for oil and gas resources would be jeopardized.

January 7, 1986

Mr. Jack Kelly
Area Manager
Lander Resource Area
Bureau of Land Management
page three

There is one point which needs clarification in the Final RMP that is the discussion on Page 180, Environmental Consequences, regarding No Surface Occupancy (NSO) stipulations. It is stated on Page 180 that 50,000 acres of the Lander Resource area are subject to NSO stipulations; while Table 3-3 on Page 13 indicates that 171,000 acres are subject to NSO stipulations. Apparently there are different types of NSO stipulations: those which may be waived and those which are not. It is not clear which stipulations are being referred to in the discussion of these stipulations and to incorporate a comparison into the Plan.

In addition, concern we would like to address is the lack of discussion on the Oregon and Mormon Pioneer National Historic Trail. It is our opinion that the documents which were released earlier this year should have been prepared as a major revision to the Final RMP and the Summer RMP, and should have been included in the Lander RMP. We are aware as to how the management decisions contained in the Trails Plan will be utilized in conjunction with the RMP. We further believe that the proposed Trails Plan will put another layer of restriction which is unnecessary when viewed in light of other regulations already in existence. For example, a 1/4 mile buffer zone on either side of the trail or the visible horizon is unreasonable. These types of buffer zones would cause an undue burden to operators who find that routing of pipelines on other rights-of-way are cost-prohibitive. A 1/2 mile buffer zone removes hundreds of thousands of acres from surface opportunity for oil and gas activities. It is our opinion that a width of 100 feet or so total corridor is more reasonable. There are existing operations which are within 100 feet of the Oregon Trail and which cause no impacts to the Trail. Much more evidence is currently available, we see no reason to further constrain activities.

In conclusion, we support the RLM's proposed land management decisions, provided that the above-mentioned modifications are made. It is our opinion that these changes will make a more reasonable, balanced plan.

Thank you for your consideration of our comments. We would be happy to discuss our views with you. Please do not hesitate to contact me if you have any questions.

Sincerely,

John E. Felt
John E. Felt
Public Lands Director

JPW

Should drilling activities increase substantially in moderate areas and the rating changes from moderate to high, these lands would be leased using the management prescription for KGSs and high potential areas. The Final EIS has been modified to explain this process better, please see overview of Preferred Alternative.

2. See the general response to wilderness comments.
3. The Final EIS has been modified to explain this situation.
4. The RMP discussions on the Oregon/Mormon Pioneer Trail state that the RMP would be consistent with the recommendations in the Oregon/Mormon Pioneer Trail Management Plan. The Plan outlines general recommendations for trail management and use on public lands in Wyoming, and the Lander RMP details specific recommendations for the trail within the Lander Resource Area. The RMP provides specific recommendations that are consistent with the general recommendations of the Plan.

The Trail's Plan, for the most part, continues existing management for the Oregon/Mormon Pioneer Trail. For instance, the 1/4-mile corridor on each side of the trail, or visible horizon (whichever is closer), has been in effect since 1978. All oil and gas leases covering parts of the corridor in the Lander Resource Area have been conditioned since 1978, with a no-surface-occupancy stipulation for the portion of the lease within the corridor. Conflicts with oil and gas exploration activities since that time have been minimal. Conflicts have been minimal because:

- A. Access across the trail is not difficult due to the numerous existing upgraded roads that cross the trail which are available for use by public land users.
- B. Pipelines and other rights-of-way have been able to, in most cases, cross the trail at locations where the trail has been previously disturbed. These areas include upgraded roads, existing pipeline corridors, highway rights-of-way, etc.
- C. The trail corridor allows drilling within 1/4 mile (or less, if the visible horizon is closer) of the trail. Directional drilling along a narrow, linear corridor does not seem unreasonable to protect a National Historic Trail, 83 percent of which lies in areas of low or no potential for oil and gas in the Lander Resource Area.

The contention that existing operations within 100 feet of the Oregon Trail do not cause impacts to the trail does not take into account visual impacts to the trail. The Oregon/Mormon Pioneer Trail is of much higher significance through Wyoming largely because of the trail's intact historical setting in this region. The lack of modern intrusions (both physical and visual) in the Lander Resource Area along the trail contributes to the excellent historical settings that attract many visitors to this area each year. A ¼-mile corridor on each side of the trail maintains these excellent settings whereas a 100-foot wide corridor would not.

13

TRUE OIL COMPANY

CIVIL CODE BOOK

January 7, 1986

Mr. Jack Kelly
Area Manager
Lander Resource Area
Bureau of Land Management
P. O. Box 589
Lander, WY 82520

Dear Mr. Kelly,

The following are True Oil Company's comments concerning your Resource Management Plan/Wilderness Study on the Lander Resource Area.

CASPER, WYOMING
P. O. DRAWER 2302
P. O. BOX 2302
82502



1 You and the BLM are to be complimented for finally giving oil and gas exploration, development and production an increased weight when deciding priority considerations in sensitive areas. Though it still appears that oil and gas is not being given equal weight with other multiple use natural resources such as "wilderness". You made certain tradeoffs between oil and gas and sensitive areas, but only when the oil and gas potential was high enough to be considered significant. When a sensitive area is located in an area with high oil and gas potential, the BLM is already committed to comply with existing laws which protect these resources. Therefore, it is our belief that the BLM should modify this standard to include areas which have a moderate potential for oil and gas.

In Table 4-1 of your own plan on Page 191 of the Proposed Plan, it is obvious that there were almost as many wells drilled in areas of moderate potential as there were in areas of high potential -- and this holds true not only in the Lander resource area, but in other areas also. This indicates that areas of moderate potential are just as important in exploring for and discovering oil and gas as are the high potential areas. The amount of activity in an area should certainly be one of the points considered in determining what stipulations should be applied to that particular area and certainly more severe stipulations should not be added just because you have accumulated statistics that indicate the area has only moderate potential for oil and gas discovery.

In your plan, you state that there must be ecological diversity and the wilderness areas must have geographic distribution.

Response to Letter 13

1. See Response 1 to Letter 12.
2. See general response to wilderness comments.
3. See Response 3 to Letter 12.
4. See Response 4 to Letter 12.

2. The BLM shares your concerns for protection of the Oregon/Mormon Pioneer Trail corridor. The Preferred Alternative provides for the special management and protection of all public land portions of the Oregon/Mormon Pioneer Trail primary route, Seminole Cut-off, and the Lander Cut-off within the resource area. The corridor is in place around these routes and is recommended to continue under this RMP.



December 6, 1971

Jan. 1971, Arwa "Forest"
Lander Resource Area
Bureau of Land Management
P.O. Box 900
Lander, WY 82520

Dear Jack,

Thanks for the opportunity to comment on the draft Environmental Impact Statement for the Lander Army Reserve Modernization Project, as well as on the Grazing and Wilderness Subprojects.

These comments on your proposed plan are as specific as possible, given that we have already submitted detailed data in report form as to the plant species and protected wildlife sites. Please refer to these reports for site location data and specific management recommendations.

Tom Wall
Protection Manager
710 Brookhaven Court, Suite D
Fort Collins, Colorado 80525
(970) 493-1407



- 1 Whiskey Mountain Unit All of this unit should be taken down as 100%. If the 100% and gas station, as suggested on 10/16/68, can be taken down, then the 100% and gas station can be taken down. If the 100% and gas station can be taken down, then the 100% and gas station can be taken down.
- 2 Red Canyon Unit It is not clear whether this area has been designated as a National Monument. If it has, then the 100% and gas station should be taken down. If it has not, then the 100% and gas station should be taken down. If it has not, then the 100% and gas station should be taken down.
- 3 Heaven's Gate No mention is made of this important site in the 100% and gas station. It is not clear whether this area has been designated as a National Monument. If it has, then the 100% and gas station should be taken down. If it has not, then the 100% and gas station should be taken down.



Response to Letter 15

1. As a result of public comment, the Preferred Alternative has been modified to designate Whiskey Mountain, East Fork, the crucial elk winter range in the Green Mountain Management Unit, Lander Slope, Red Canyon, Dubois Badlands, South Pass, portions of Beaver Rim, and important segments of the Oregon/Mormon Pioneer Trail as Areas of Critical Environmental Concern.

Lands within the East Fork Management Unit would be closed to oil and gas leasing unless there is identified drainage and the BLM, Wyoming Game and Fish Department, and the U.S. Fish and Wildlife Service agree to lease with no-surface-occupancy restrictions. Furthermore, the area will be withdrawn from mineral entry.

Lands within the Whiskey Mountain Management Unit would be closed to oil and gas leasing unless there is identified drainage. If drainage is occurring, lands would be leased with no-surface-occupancy restrictions and with no exceptions. The segregations within this management unit would be revoked to open them to leasing with NSO restrictions should drainage occur. (See Chapter II, Management Actions Common to all Alternatives, Minerals Section.)

Beaver Run's abrupt change in scenery and biotic make it the best example in Wyoming of its type. Mention should be made of the cushion plant community dominated by *Distichlis spicata* ssp. *spicata*. The few species listed here are not the most characteristic of this community. It is important because of the unusual communities of rare plants it contains. Mention should also be made of the occurrence of *Penstemon parryi* and *Phlox* *hirsuta* in the *Penstemon parryi* community. *Phlox* *hirsuta* is also a characteristic community that dominates the ridgetops of this site.

4

4

5

6

7

Oil and gas leases will be issued with no-surface-occupancy restrictions on the Lander Slope, Red Canyon, and South Pass Management Units. Leases will also be issued with no-surface-occupancy restrictions on the crucial elk winter range on Green Mountain and the entire Dubois Badlands Management Unit.

Conservation easements can be pursued on a case-by-case basis in support of the management objectives in the Preferred Alternative.

2. The Red Canyon was designated an NNL in 1976. One landowner within the NNL area is not a signatory to NNL protection agreements. We are continuing efforts to have this landowner sign a voluntary protection agreement. Once the final landowner signs the agreement, the NNL can be formally enrolled as a National Natural Landmark.

A management plan for the Red Canyon ACEC will be developed after the Final RMP/EIS. The plan will identify, protect and maintain this plant species and its habitat.

3. A discussion of the rare plants and unique plant communities for the Beaver Rim area has been added to the Affected Environment of the Final RMP/EIS. The Beaver Rim Area is proposed for designation as an Area of Critical Environmental Concern in the Final RMP/EIS. A management plan will be prepared for the Beaver Rim Area which will identify, protect, and maintain the rare plants and unique plant communities in the area. The Beaver Rim management plan will be developed using an intensive inventory of the various unique resource values for this area. The two grazing allotments that encompass the area are both high priority I allotments within the Green Mountain Grazing EIS Area. These allotments have been intensively monitored since 1982 and the actual use levels for livestock have been below the current stocking levels and authorized grazing preference. The development of the Beaver Rim management plan is discussed briefly in the main volume of the Final RMP/EIS because the Beaver Rim Area is located in the Beaver Creek Management Unit. The Lander Resource Area may request The Nature Conservancy's expertise and assistance in the identification and inventory of the rare plants within the area during the development of the management plan.

4. The two *Antennaria arcuata* enclosure locations are actually within the Beaver Creek Management Unit. A discussion of this plant species has been added to the Affected Environment chapter of the Final RMP/EIS. The current BLM monitoring studies would continue for the two enclosures and the associated protected plant populations.

The DEIS should include a fuller discussion of Areas of Critical Environmental Concern as a management option. ACEC's would protect sensitive sites from all surface mining activities except for extractable minerals in sites five acres or less. The Nature Conservancy supports the designation of the ACEC's recommended in the Preferred Alternative. They are a step in the right direction, but they should also be used to protect sites like Beaver Run.

- Finally, The Nature Conservancy has submitted a formal List of Under-Taxa and Communities to Lander AR planners. Little evidence is being shown to appear in the DEIS. Planners should consult it again in the revision process. The List is divided for WU's convenience into three parts:
- A. Top Priority Taxa That Need Initial or Further Investigation:
 - 1. Arceuthobium spp. Rotting
 - 2. Arctostaphylos spp. Rotting
 - 3. Arctostaphylos spp. Dorn & Lichner
 - 4. Penstemon spp. (Dorn & Lichner)
 - B. Top Priority Plant Communities That Need Further Baseline and Inventory Work:
 - 1. Arctostaphylos spp. Rotting
 - 2. Arctostaphylos spp. Dorn & Lichner
 - 3. Penstemon spp. (Dorn & Lichner)
 - C. List of Rare Plants on the RA:
 - 1. Arctostaphylos spp. Rotting
 - 2. Arctostaphylos spp. Dorn & Lichner
 - 3. Penstemon spp. (Dorn & Lichner)
 - 4. Penstemon spp. (Dorn & Lichner)
 - 5. Penstemon spp. (Dorn & Lichner)
 - 6. Penstemon spp. (Dorn & Lichner)
 - 7. Penstemon spp. (Dorn & Lichner)
 - 8. Penstemon spp. (Dorn & Lichner)
 - 9. Penstemon spp. (Dorn & Lichner)
 - 10. Penstemon spp. (Dorn & Lichner)

Yours,
Tom Hull
Tom Hull

cc: Gene Hollman
Raulos District Office

5. Under the Preferred Alternative, some of the plant diversity areas are within Areas of Critical Environmental Concern (ACEC) (Red Canyon, Beaver Rim and Oregon/Mormon Pioneer Trail Corridor) and a no-surface-occupancy restriction for oil and gas leasing would be used to protect the sensitive plants. For the unique plant community areas southwest of the South Pass Historic Mining Area, we would use a special resource protection stipulation to protect the sensitive plants identified.

The areas designated as ACEC in the Preferred Alternative would require mining claimants and operators to file plans of operation with the BLM. We would review and approve such plans with the intentions of protecting the sensitive plants from unnecessary and undue degradation prior to that approval. The surface management regulations for operations under the General Mining Law (43 CFR Subpart 3809) provide for complete protection of species classified as threatened and endangered species.

6. These two rare plant species are now mentioned in the discussion of the South Pass Management Unit Affected Environment section. The information provided by The Nature Conservancy (TNC) has been used as the basis for this discussion.

These two plant species will receive special management such as no-surface-occupancy protection from oil and gas leasing under the ACEC management plan for the South Pass Management Unit.

7. The decisions and analyses in the Green Mountain Grazing EIS were reviewed during the development of the Lander RMP. The basic data and management actions discussed and analyzed in the Green Mountain Grazing EIS have not changed significantly since 1983.
8. The list of unique plant taxa and communities submitted by The Nature Conservancy has been reviewed. The list and associated information have been incorporated into the Affected Environment of the Final RMP/EIS.



November 13, 1985

Mr. Jack Kelly
Land Resource Area Manager
P. O. Box 585
Lander, WY 82520

Dear Sir:

Re: Comments on the Draft,
Lander Resource Management Plan

You and your planning staff are to be commended for the excellent job done. The trade-off of resources, where appropriate, is a step rarely taken in many planning documents, yet never carried out. The analysis done on oil and gas shows a balanced consideration. Specific resources and protection of them are looked at on an area wide basis.

1 The only change that is suggested deals with the division of High from Medium potential in determining stipulations and other requirements under the preferred alternative. As shown on Table 4-1 (Pg. 151), the number of wells drilled in High and Moderate potential areas accounts for over 90% of the wells drilled in the Lander Resource Area. For this reason, and for the fact that most wells are drilled in High to Moderate potential areas, the dividing line should be between Moderate and Low potential for the preferred alternative.

2 The major problem we see with the draft is the discussion of the Oregon/Mormon Trail system. The designation of historic cultural sites, which are finite in nature, is an acceptable practice. Much current laws and regulations already in place to protect and avoid cultural/archaeological sites, it is unnecessary to adopt another management plan. Generally, cultural/archaeological clearance is required under the federal oil and gas lease, as well as for rights-of-way permits. To designate an undefined, or loosely defined, corridor across the State of Wyoming, effectively cutting the lease in two is unwarranted. The trail is not a continuous line distinguishable from other terrain. In places, it is branched and divided greatly. The time and the thought given the other resources, in this plan, have not been carried through when the discussion of the trail



Response to Letter 16

1. See Response 1 to Letter 12.
2. The BLM developed a management plan for the Oregon/Mormon Pioneer Trail as required by the National Trails System Act, the Oregon National Historic Trail Comprehensive Management and Use Plan, and the Mormon Pioneer National Historic Trail Comprehensive Management and Use Plan. The plan covers the Oregon and Mormon Pioneer Trails on public lands in Wyoming. The plan was designed to provide consistency in management of the trails over the entire State. Corridors, where applicable, are a necessary part of this management. These corridors are designed to protect the physical and visual integrity of the trails. This is especially important in central and western Wyoming, where the trails have excellent historical settings and integrity.

The trails run across Wyoming, but they do not cut off one half of the state from the other half. The RMP Preferred Alternative for the Oregon/Mormon Pioneer Trail, for the most part, continues existing management for the Oregon/Mormon Pioneer Trail. For instance, the 1/4 mile corridor on each side of the trail, or visible horizon (whichever is closer) has been in effect since 1978. All oil and gas leases covering parts of the corridor in the Lander Resource Area have been conditioned since 1978 with a no-surface-occupancy stipulation for the portion of the lease within the corridor. Conflicts with oil and gas exploration activities since that time have been minimal because: 1) access across the trail is not difficult due to the numerous existing upgraded roads that cross the trail which are available for use by public land users, 2) Pipelines and other rights-of-way have been able to, in most cases, cross the trail at locations where the trail has been previously disturbed. These areas include upgraded roads, existing pipeline corridors, highway rights-of-way, etc.

The trail corridor was not designed to encompass all of the numerous variants and alternates of the Oregon and Mormon Pioneer Trails. The corridor covers only the single primary route of the Oregon/Mormon Pioneer Trail (both trails follow the same route in the Lander Resource Area), the Seminoe Cut-off (a major variant of the Oregon/Mormon Pioneer Trail), and one short segment of the California Emigrant Trail (the only part of the California Trail in the Lander Resource Area that does not follow the Oregon/Mormon Pioneer Trail route).

Mr. Jack Kelly
November 13, 1985
Page 2

2 management is considered. There is a confusing point when one reads the proposed management plan for the Oregon/Mormon Pioneer National Historic Trails and the draft Resource Management Plan. The objectives discussed in that plan seem to contradict us another by saying that existing land uses may need to be modified and later that trail management will not restrict subsurface land uses or activities that were existing within the trail corridors.

Thank you for the opportunity to comment on one of the most concise and complete plans seen to date. We hope you will incorporate our comments into the final.

Sincerely,

Bradley G. Penn
Bradley G. Penn
Land/Environmental Coordinator

NCP:mg

The Oregon/Mormon Pioneer Trail Plan specifies the following:

"7. Existing land uses within the sites and segments identified in this plan which are compatible with historic preservation and public use will be continued. Existing land uses which may be incompatible with historical preservation of sites and trail segments will be monitored and, if necessary, modified to make them as compatible as possible (Section II.A of the above).

11. Trail management will not restrict authorized land uses or activities that were existing within the trail corridors at the time of designation as National Historic Trails, unless these uses are or become incompatible with trail preservation or protection."

Note that in each case that incompatible existing uses are to be monitored and/or modified in order to protect trail resources.

17

FOURTH SECOND FLOOR
1801 CALIFORNIA STREET
DENVER, COLORADO 80202



November 29, 1985

Mr. Jack Kelly
Lander Resource Area Manager
P.O. Box 569
Lander, Wyoming 82520

Dear Mr. Kelly,

Thank you for responding to my request for a copy of the Draft Resource Management Plan. I appreciate this opportunity to comment on its contents.

The Resource Management Plan and the Draft Environmental Impact Statement are seriously flawed, and major changes must be made before they will meet the standards demanded by statute, by sound policy, and by simple common sense. Unfortunately, I have insufficient time to discuss many of the important issues in detail, but the most crucial problems with the Plan are so fundamental they can be stated without lengthy discussion.

1. The Plan Should Consider an Alternative Which Would Reduce Development of the Resource Area.

NEPA and BLM regulations require consideration of a spectrum of alternatives. The purposes of NEPA are frustrated when consideration of alternatives is unreasonably restricted. Greene County Planning Board v. Federal Power Commission, 559 F.2d 1227 (2d Cir. 1976), cert. denied, 436 U.S. 1006. "All reasonable" alternatives must be considered even if they do not offer a complete solution to the problem. National Resources Defense Council, Inc. v. Administrator, Energy Research and Development Administration, 451 F.Supp. 1245 (D.C.D.C. 1978). The duty to develop and

Response to Letter 17

1. Thank you for your comment. Your suggested alternative has been considered and a discussion provided in Chapter I.
2. All public views and opinions were actively sought during this planning process. The RMP mailing list contains over 700 names of groups and individuals located in Wyoming, Washington D.C., Colorado, Montana, Idaho, California and other states. These groups and individuals received newsletters and other mailings seeking their review and comments on this Draft RMP/EIS. We believe this RMP reflects a multitude of public interests providing for a diverse mix of resource uses ranging from wilderness to wildlife habitat and rangeland management to mineral leasing and development.

BLM is sincerely interested in gathering input on the Draft RMP/EIS. We filed Federal Register Notices, held open houses, two public hearings, issued several news releases, spoke on radio talk shows, presented programs to dozens of special interest and user groups, met individually with other users and publics, and consulted with local and county governments and state officials.

thoroughly consider alternatives to proposed actions requires substantive, good-faith consideration of alternatives to the fullest extent possible, a very high standard. Libby Rod & Gun Club v. Federal, 457 F. Supp. 1177, aff'd in part, reversed in part on other grounds, 594 F.2d 742.

- 1 While four alternatives are discussed in the Draft Resource Management Plan (DRMP), the alternatives in no way represent a spectrum of choices. Instead the alternatives are mere variations on a single development strategy, and the choices considered were unreasonably constricted. Every Alternative considered would result in further development of the Lander Resource Area. No Alternative consistently considers reducing or restricting development. The Alternatives selected give the appearance of compliance with statutory mandates while leaving the substantive choices undisclosed and unscrutinized.

2 2. The Process Used to Identify Issues and Develop Planning Criteria Was Seriously Flawed. The Criteria Do Not Reflect Consideration of the Public Interest.

The limited range of Alternatives considered is the result of the faulty procedure used to identify issues and develop planning criteria.

The BLM has a statutory mandate to consider the public interest in formulating management policies, not merely the comments of a portion of the public. The BLM has a duty to consider the public interest, even if the comments it received about the Plan reflect only a narrow range of opinion.

In developing the Lander DRMP, the BLM considered only the desires of a very limited segment of the public, a segment whose self-interest is closely tied to the BLM's Lander Resource Area development policies. The greatest public input about the proposed plan came from interests in the immediate vicinity of the Lander Resource Area. The agency did not seriously solicit the views of interests outside this small area.

This is clear from the issues ultimately identified: grazing rights, oil and gas development, commercial timber rights, and the desire of local interests to buy portions of the Resource Area are hardly the issues most

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Americans would place high on the list of issues important in the management of the public lands of the United States, yet these are the issues the agency identified as those to be resolved by the DRMP.

- 2 These issues clearly do not represent the views of the public as a whole and certainly do not reflect the public interest. Yet they serve as the basis for the criteria set by the BLM. By relying on a small, self-interested group, the BLM avoided its statutory duty to consider the public interest. The agency must do more than listen to the desires of local interests; it must base its decisions on what is best for the public as a whole.

3 3. The Criteria Used To Determine Wilderness Suitability Are A Sham. They Represent implicit Choices Against Wilderness Designation And Do Not Fairly State The Wilderness Suitability Issue.

The issue of Wilderness Suitability deserves special treatment because of the absurd manner in which the BLM states this issue, while nearly every American, whether favoring additions to designated wilderness or against further designations, would consider wilderness identification a major concern in the formulation of public land use policies, the manner in which the agency states this issue makes its inclusion in the DRMP a sham.

Concerns identified by the agency in its "scoping process" include whether wilderness designation "would adversely affect mineral exploration and development," whether wilderness designation would "adversely affect the livestock industry by reducing or eliminating livestock grazing, limiting motor vehicle access, disrupting traditional use patterns, and increasing visitor use with resultant problems of vandalism, litter and fire," whether "livestock operators could be displaced or be put out of business," and whether "wilderness designation would limit recreational use through eliminating access by motor vehicles."

These criteria have absolutely nothing to do with preserving and

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Copies of the Draft RMP/EIS were available at the county libraries. We were also interviewed by the media on several occasions. We distributed over 1,000 copies of the Draft RMP/EIS and have received over 600 letters and comments in response to our efforts to involve the public.

3. See general response to wilderness comments.
4. Each alternative presented in the Lander RMP represents a comprehensive multiple-use plan that provides for resource management of over 2.5 million acres of public lands and minerals in central Wyoming. Resource uses on these 2.5 million acres are diverse and extremely complex. Because of this complexity and diversity, it would be difficult, if not impossible, to develop a plan that would have one single theme other than multiple use.

protecting wilderness. They have everything to do with preserving and protecting vested economic interests.

While these criteria may help identify areas of value for grazing, they are completely irrelevant to whether an area is suitable for wilderness designation. Inherent in the choice of these criteria is a definition of wilderness which amounts to "areas undesired by any group seeking economic development."

3 The wilderness Act contains a much different definition. See, 16 U.S.C. §§ 1131, et seq. The definition contained in § 1131(c) does not mention suitability for mining or for other economic development; unlike the definition inherent in the "issues" used by the BLM in this Plan, it correctly and honestly attempts to define what wilderness is and why wilderness is important.

There is little question that developing a management plan requires the agency to reconcile competing interests. This is the reason a plan is necessary. Nonetheless the agency should not be allowed to escape the difficult choices inherent in this process by defining one interest in terms which are set by a competing interest. The BLM defines wilderness as areas not useful for grazing or mining. Instead of fairly stating the competing interests, the BLM has implicitly decided that mining and grazing interests are superior to wilderness interests and avoided the very choices the Plan is intended to consider.

Most of the remaining concerns identified by the agency during the "scoping process" are relevant to the wilderness issue. Unfortunately, even a brief glance through the DEIS reveals that these concerns received little actual weight during the decision making process.

4 4. The Alternatives Selected For Discussion Either Do Not Represent Coherent Strategies, Or The Strategies They Represent Are Not Adequately Explained.

Little needs to be said on this point. I am unable to find an explanation of the Alternatives as coherent approaches to the management of Lander Resource Area. Within each Alternative, the choices appear to represent

4

no comprehensive approach. Instead, alternatives B and C appear to be mere repositories of relatively randomly selected choices. Similarly the development of the preferred alternative does not represent a reasoned choice based upon policy. The preferred Alternative appears to represent an incoherent series of choices without any single unifying purpose or strategy.

Once again, thank you for this opportunity to comment. I look forward to hearing of your decision in this matter.

Sincerely,

Mark Hughes

5



PETROLEUM ASSOCIATION OF WYOMING
a division of Rocky Mountain Oil and Gas Association

330 South Center, Suite 115
Gasper, Wyoming 82401
(307) 234-5333

Robert H. Remick
Executive Director
Woods on Plains
Associate Director

January 17, 1989



Mr. Jack Kelly
Lander Resource Area
Bureau of Land Management
P.O. Box 189
Lander, Wyoming 82520

Re: Lander Resource Management Plan and Wilderness Supplement

Dear Mr. Kelly:

On behalf of the Petroleum Association of Wyoming, a division of the Rocky Mountain Oil and Gas Association, whose members account for 90% of the petroleum produced and 80% of the wells drilled in Wyoming, please accept the following comments on the Lander Resource Area Management Plan and Wilderness Supplement.

PAW is in general support of the Preferred Alternative "B". While there are several clarifications and modifications which we would recommend, the draft plan sets a commendable job of affording oil and gas resources the same priority consideration afforded other resource values. We are pleased that the proposal considers the importance of coordinating energy and mineral activities with other multiple uses and recognizes mineral potential as a factor in determining management decisions. This approach, we believe, provides a meaningful management tool, and assists the BLM in meeting the requirements of federal planning laws.

- 1 The Preferred Alternative provides that energy and mineral resources will receive priority treatment in areas determined to have high potential. We believe this BLM policy should be modified to place on-high areas rated as having moderate potential for oil and gas. The resources incorporated into Table 4-1 (p. 74) indicates that almost as many wells are drilled in areas considered to have moderate potential as those drilled in high potential areas. It is apparent that moderate areas are of equal importance in the discovery of new oil and gas reserves as the high areas. Similar management would apply, not more severe restrictions. We are confident that this policy could be so modified, while maintaining full protection of sensitive resource values.

- 2 The draft plan does a good job of describing what kinds of stipulations may apply to oil and gas operations. Total affected acreage figures are provided as well as maps indicating the areas involved. While this information is



330 South Center, Suite 115
Gasper, Wyoming 82401

Mr. Jack Kelly
January 17, 1989
Page 2



- 2 helpful there does appear to be some confusion in regard to total net surface occupancy (net) acres. Table 2-3 (p. 43) shows net restrictions on 17,400 acres. Various discussions (in the document, however, after conflicting figures such as 630,000 acres subject to statewide standard net stipulations and 65,000 acres subject to site-specific net stipulations, p. 148). On the other hand a reference on page 271 to Table 4-1 (which we believe is actually Table 4-4) discusses 150,000 acres of area wide net restrictions. We understand that there are different types of net restrictions, some which may be waived, some mandated, some area wide and some statewide. Therefore, we urge the BLM to clarify the use of the term and correct the figures where appropriate for better understanding.

Appendix 2 lists the standard protection requirements for surface disturbing activities, including oil and gas operations. The "guidance" discussions following each stipulation set very good explanations of the proper use of these restrictions. We note that legal descriptions will be required for wildlife stipulations and should be measurable and legally defensible. We are also pleased to see the reminder that when considering a no-lease option, a rigorous test must be met and fully documented in the record. We urge continued adherence to these policies.

- 3 We suggest the Final Plan incorporate a more detailed discussion of the Oregon/Wyoming Pioneer Trail Plan than is currently provided (p. 21). The proposed Trail Plan represents an additional layer of regulation, and should be included in this and other affected resource area plans. At this point, we are unsure as to how the Trail Plan management decisions relate to the Preferred Alternative. Plans provide further clarification.

- 4 PAW is in support of all of the "unavailable for wilderness designation" recommendations in the wilderness supplement. We do not concur, however, with the partial wilderness designation of the Duckwater Canyon wilderness study area. This area contains numerous post-1909 oil and gas leases which would remain unexplored under the proposed action. We also question the need for additional wilderness designation because of the availability of extensive wilderness opportunities in the area and the state.

This draft plan offers detailed analysis of how oil and gas activities impact other resources, ways to minimize these effects, as well as how management decisions impact the ability to conduct oil and gas activities. We appreciate this comprehensive effort and believe that the draft proposal represents a well integrated management plan.

Sincerely,
Wendy M. Brown
Wendy M. Brown

cc: Hillary Odon
Fred Penn
Bob Byron
Alan Trull

Response to Letter 19

1. See Response 1 to Letter 12.
2. The Final EIS has been modified to explain this situation.
3. See Response 4 to Letter 12.
4. See general response to wilderness comments.

Response to Letter 20

1. See Response 1 to Letter 15.

2. Much of the land behind the Dubois Badlands which you refer to is privately owned. Range resource inventories on public land in these areas do not indicate very poor range conditions (see table B-7 in the Grazing Supplement). We have noted your suggestion to change the category on allotment No. 2124 from M category to I category. We will begin the consultation process to reconsider the category for this allotment. This would give the allotment greater priority for management attention.

3. See general response to wilderness comments.

20

January 20, 1966

Jack Kelly
Area Manager
RIM
Box 589
Lander, WY 82520

Dear Sir,

Please accept this comment on the Lander Resource Management Plan as part of the official record.

I must begin by saying that I am greatly disturbed by the tone and direction the plan takes for the next 10 years of management. Despite much discussion and sentiment from the public indicating the need to preserve rather than exploit our Federal lands, the BLM has almost unanimously voted to market every available resource on the public lands it manages, even at a loss if necessary.

1 I am particularly appalled to learning with RUC stipulations the critical wildlife habitat areas of Snake Mountain and the East Park Indian Range. The BLM admits themselves in the plan that a action will threaten the future health and well-being of the sheep and elk, and yet the recommendation is still made to lease the area. This can only be a state mandate, for I doubt anyone who works in the Lander District being so short-sighted as to jeopardize the largest bighorn sheep herd in the U.S. and one of the best winter ranges for Yellowstone elk for the danger possibility of a little low grade, high sulfur crude oil in an area of such low mineral potential. I strongly urge you to withdraw all leasing for oil and gas as well as locatable minerals from areas of critical wildlife habitat and winter range.

2 While on the subject of wildlife, it has come to my attention while out in the hills surrounding Dubois that severe overgrazing has taken place over the years and is not being corrected. In particular, the lands behind the Dubois Badlands north of the wind cover and west of the East Park are in very poor condition. With so little vegetation, erosion has been a real problem that is not likely to be corrected until the grasses are allowed to recover the ground. I would suggest that grazing leases in areas like this be reduced substantially in order to let the grasses regenerate. Also of concern to me are the areas south of the Wind River below the forest boundary and above the private landowners' fence line. Between the mountain and the wind cover Indian reservation, again, the

2 livestock using these lands should be reduced indefinitely until the vegetation can regrow. It is unacceptable that the BLM needs to be more than just an allotment in category C or D that would maintain their present state when a larger portion of the allotment is in the poor or fair condition than in the good to excellent condition. It certainly seems as though some management coordination is in order between the BLM and the U.S. Conservation Service.

3 I am disappointed that the plan only recommended part of one AIA for wilderness. The BLM is allowing its true colors to be by trying with a completely orientation in its management plan. The excuses for not making the Copper Mountain and Westwater Roads area wilderness areas are ridiculous. If wilderness is in so much demand among the public, it isn't logical that the Federal Land Management Agency designate less wilderness areas. At that is what the BLM is suggesting by saying that there will be increased use of all areas so designated. As an out to the NME that the words of Westwater Canyon, as well as Copper Mountain and Westwater Roads are the best 10,000 acres made wilderness area. Considering the millions of acres added to the national wilderness plan. Also I recommend that off use is prohibited in these areas, since they are areas of sensitive land and highly erodible. There are many areas where off use is acceptable and more appropriate than these AIA's.

I hope the BLM takes the job of site analysis of our public lands more seriously in the next 10 years. They have in the past and consider the possibility that these resources are expendable or convertible as you choose. Let's choose in the common interest of the general public rather than the corporate interest of a few.

I look forward to seeing the final Lander Resource Management Plan and hope it is improved over the presently poor draft.

Sincerely,

Herbert Taylor
Herbert Taylor
Spring Horns, WY 82513



P. O. Box 659
Dubois, WY 82513
January 28, 1985



Mr. Jack Kelly
Lander Resource Area Manager
P. O. Box 308
Lander, WY 82520

Dear Mr. Kelly:

I appreciate very much the opportunity to review and comment on the Draft Resource Management Plan/Environmental Impact Statement for the Lander Resource Area. It was good to see that certain concerns I expressed at your open house in Dubois in 1984 were dealt with in the draft.

In my estimation the wildlife resource is by far the greatest asset in the upper Wind River area, and your plan seems to go as far as it can to protect that resource. I think you and your staff should be commended for this effort. The community interests no doubt have expressed their desire to keep all lands open to oil, gas and mineral exploration and development. Considering the low potential for such development on this area I believe you have left plenty of opportunity open for these endeavors while at the same time protecting the wildlife values that make Dubois so special.

- 1 One potentially major problem yet to be dealt with is the wide drilling leases in the East Fork Big Winter Range. If drilling must be allowed it should be done only with very stringent stipulations to limit surface disturbance, water pollution and winter activity. Since a rather large acreage is involved in oil and gas leases I would like to see an RMA prepared when RMA receives its first AFO for the East Fork. Multiple drilling sites could cause severe disruptions to the wintering elk herd, especially if they resulted in producing fields. Mitigation in this case would be difficult if not impossible. I support your decision to withdraw the balance of the unit from mineral exploration that has not already been withdrawn.

- 2 In reference to the Dubois Badlands I did not see any mention of plans for existing grazing leases. I think cattle grazing should be reduced and eventually eliminated from the badlands since the area provides important winter forage for elk and deer as well as big horn sheep. Adjacent private meadowlands along the Wind River are heavily used by winter sheep in the fall and winter. Reduction of summer use of the RMA lands should take some of the pressure off these private lands.

- 3 In your grazing supplement I was glad to see alternatives designed to improve range conditions, but was extremely disappointed that there was no economic analysis. Range improvements may be able to increase RMA's, but at what cost? The RMA grazing program already loses a considerable amount of money for the taxpayer, so I do not think that more programs should be initiated if they are going to lose even more money in the long run.

Your alternative C, which reduces livestock grazing by 40%, is not seriously considered, but possibly it should be. I think the benefits to wildlife is understated, especially where elk are involved, since it would affect their winter range as well as their summer range. Antelope can winter nicely on big sage, but will also utilize shrubs and forbs if they are available.

- 4 I would like to see an economic analysis of range improvement alternatives for livestock vs no range improvements, along with reductions or eliminations of livestock grazing. My bet is that the increased value of big game animals together with the reduced costs of grazing programs would show a very positive effect on net public benefits. Ranchers are learning that big game hunting can generate more income for them than their cattle do in some areas. Game animals are also known to be more efficient in converting forage into protein and are being used as a source of meat in some countries in place of less efficient domestic livestock. Perhaps these alternatives should be examined here, especially where current grazing programs cost more to administer than they generate in grazing fees.

Sincerely,

Duane L. Howe
Duane L. Howe



1. The oil and gas leases within the East Fork Elk Winter Range have expired.
 2. General management actions and proposed range improvements for allotments 2112 and 2121 in the Dubois Badlands are in the Grazing Supplement, Appendix B. Reductions in numbers of livestock or elimination of livestock from I category allotments is discussed in the Grazing Supplement, Part B.
- Even though the Dubois Badlands are leased for livestock grazing, the cattle actually make limited use in the badland area. This is due to lack of water, limited forage production, and steep slopes. Further reduction or elimination of the livestock grazing by BLM within the Dubois Badlands may relieve some of the winter grazing pressure on the private meadowlands by wildlife. However, we do not feel this reduced pressure would be significant.
3. Benefit cost analysis of the proposed range improvement projects can be found in Appendix B of the Grazing Supplement.
 4. Your concerns, including economic considerations, were included in the analyses of Alternatives E and D presented in the grazing supplement.



United States Department of the Interior

NATIONAL PARK SERVICE

RUCKY MOUNTAIN REGIONAL OFFICE
100 Park Avenue
P.O. Box 1240
Denver, Colorado 80202

IN REPLY REFER TO:

L7617 (RMP-97)

JAN 23 1988



Memorandum

To: Lander Resource Area Manager, Bureau of Land Management, Lander, Wyoming

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Resource Management Plan/Environmental Impact Statement for the Lander Resource Area, Bureau of Land Management. (COP 85/24)

This memorandum constitutes our comments on the draft Resource Management Plan/Environmental Impact Statement (RMP/EIS).

No areas administered by the National Park Service would be directly affected by implementation of any of the alternatives outlined in the draft RMP/EIS. The document includes excellent discussions on recreation, historic trails, and cultural resources. Especially noteworthy is the site-by-site analysis of National Register eligibility. Likewise, the discussions of proposed National Natural Landmark (NNL) areas and other natural resources beginning on page 145 are appropriate and well done; better graphics for the locations of the NNL's would have been helpful.

In sum, the concerns (direct and indirect) of the National Park Service have been covered in the draft RMP/EIS. However, we have some comments you may wish to consider as the final document is being prepared.

The document, as expected, reflects the Bureau of Land Management policy of multiple use of all resources. The four alternatives weigh in a general sense the entire spectrum of possible management approaches to the Lander resource. In concert with the conclusion that Alternative A (page 238) "... would be the least beneficial choice of all the alternatives from a cultural/historical history resources protection viewpoint," implementation of this alternative would adversely affect the Oregon/Wyoming Trail corridor and some proposed NNL areas, among other impacts.

Although we note (page 352) that implementation of Alternative B "... would be the most beneficial choice of all the alternatives from a cultural/historical history resources protection viewpoint," we agree that the preferred Alternative D provides a good balance between resource protection and provision for active management (wildfire extraction, grazing, etc.).

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Scattered throughout the draft RMP/EIS are references to "national significance". In some instances the criteria on which "national significance" is based are clear (e.g., National Register eligibility, proposed NNL's, etc.). However, in the discussion of land exchange and disposal (page 31) we note the statement that "Lands with national significance will not be conveyed." Although we agree with the various criteria for retention and disposal, we could use, from the material presented, ascertain how or by whom "national significance" is determined.

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In this regard, the discussion of "landownership adjustments" on page 295 are insufficiently detailed to give the reader an adequate picture of what lands are subject to disposal. This discussion should somehow be tied into a specific list of "nationally significant" areas, or at least into a description of key resources contained in the document. The brief list of "significant resources" on page 78 leaves out several described earlier (e.g., on page 27 "... the kind of river formation contains various types of 'islands of national significance'"). The selection of certain sites as "Areas of Critical Environmental Concern" (page 206) is appropriate, but we would like to see more explicit information on the plans for the management of other "nationally significant" areas.

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A few comments on the geological aspects of the "Wilderness Supplement" are in order. For each wilderness study area there is a discussion of geology and geologic resources. Nowhere could we find mention of paleontological resources, even though exposures of significant fossiliferous strata occur in the Lander Resource Area.

Appendix III of the "Wilderness Supplement" contains a geologic time scale. Some headings (for example, the Tertiary Period) could be misleading to the general public, which usually is unaware of the direction in time scale. Also, the scale omits the Ordovician Period.

Thank you for the opportunity to review the draft RMP/EIS.

Richard A. Strait
Richard A. Strait



Response to Letter 56

1. National significance as used in the text is a generic term. National Register eligibility and the National Natural Landmark program are the two most common examples of national significance that apply to public lands. The reference "Lands with national significance will not be conveyed" refers specifically to lands patented pursuant to the Recreation and Public Purposes Act. Our guidance in determining if lands are of national significance, related to this Act, is to consider such factors as suitability for nomination to the National Register of Historic Places or whether the lands have any natural features which make them nationally unique.
2. The intent of this portion of the text was to provide an overview of total acres and parcels that were being considered for disposal in the Preferred Alternative. Detailed descriptions of the parcels being considered for both retention and disposal can be found in the specific Resource Management Unit sections of the Preferred Alternative which address landownership adjustments (see the Table of Contents for Chapter V).
3. The significant resources listed in the Cultural/Natural History section of Chapter V should be understood to be significant resources that would be significantly affected by the alternatives in this RMP. Other than known special areas already identified in the RMP, such as Beaver Rim, newly discovered paleontological resources would be managed and protected if necessary under BLM's standard paleontological management measures (see Chapter II, Management Common to All Alternatives), and would therefore not be significantly affected.
4. See general response to wilderness comments.

Citizens for Multiple Use

BIA/BLM • DEER IN DUBOIS • 2-11-1



January 29, 1988

Jack Kelly, Area Manager
Bureau of Land Management
Lander Resources, Inc.
P.O. Box 389
Lander, WY 82020

Dear Mr. Kelly:

Members of the Dubois area Citizens for Multiple Use wish to express their sincere appreciation for the opportunity to formally react to the Draft Resource Management Plan/Environmental Impact Statement.

Citizens for Multiple Use is a recently formed organization of local citizens numbering over 400 representing the greater Dubois area of Fremont County. As a group we endorse a balanced multiple use of resources including sustained forestry yield management, oil and gas exploration, prudent wildlife management of public lands, and recreation. We endorse the philosophy of good stewardship in our natural environment.

A broad based committee from the Dubois area multiple use group has reviewed the BLM draft plans and desires to go on record with the following endorsements:

1. The overall development of the plan reflects a high level of competency.
2. We compliment the BLM plan for involving those groups of people directly affected by the plan.
3. We support the position taken in the plan for the Whiskey Mountain area relative to mineral exploration which states "no surface occupancy, etc."

Jack Kelly, BLM Area Manager
Page 2
January 29, 1988

4. We support in general the "Preferred Alternative Plan."

As a committee we have concerns which we desire to bring to your attention. We are hopeful that you will consider the following areas:

1. We feel there are currently sufficient lands designated "wilderness areas" and that no further increases in this type of acreage are necessary.
2. We consider any wolf recovery project a direct threat to our concept of multiple use and to the stability of our environment.

We respectfully request that you place us on the BLM mailing list. We desire to be current on happenings in the BLM.

Again, we appreciate the opportunity to respond to the BLM plan.

Sincerely,

John M. Smith
Chairman of BLM Plan Review Committee

JMS:am

Response to Letter 96

1. See response 1 to letter 15.
2. See general response to wilderness comments.
3. This office has had no participation in development of a wolf recovery plan, and has had no official contact or request to participate in implementation of one. The wolf is a federally listed endangered species. Any actions we might be involved with, in the future, would be consistent with federal laws, primarily the Endangered Species Act.

We will place your organization on the mailing list.

Oil and Gas Leasing

The overall theme for management of the oil and gas resources within the resource area to make public lands available for leasing to the maximum extent possible on page 289 will not be beneficial to critical wildlife needs. Very few of the areas that would be open to oil and gas leasing serve as important wildlife habitat and harassment or disturbance by humans can only prove detrimental to wildlife.

The Environmental Consequences you mention on pages 189, 190, and 192 portray an accurate analysis of how oil and gas exploration and development stresses, disturbs, and displaces wildlife and how its effects are compounded on critical habitat.

I feel that the No Surface Occupancy Leasing selected as the preferred alternative does not adequately protect the critical habitat in a long term manner.

I suggest that two areas which would be affected greatly by this plan, the Whiskey Basin Bighorn Sheep Winter Range and the East Fork Winter Range should be withdrawn from all oil and gas leasing.

You state that locatable minerals should be withdrawn on these two areas, but not the withdrawal of oil and gas leasing. This is very inconsistent.

Off Road Vehicles (ORV)Dubois Badlands

I support the preferred alternative to close the entire unit to ORV. It disturbs me to think that there would be little or no enforcement of this abuse if plan is gone ahead with. BLM has difficulty enforcing laws on current land.

Wilderness

I support the proposal of having the Dubois Badlands become wilderness. I do not support Whiskey Mountain wilderness proposal.

Man has caused himself to manage habitat properly due to past poor management practices. With wilderness areas now, we cannot manipulate or improve existing conditions. For too long we have suppressed fires, overgrazed and overharvested our resources. By just eliminating these activities, the areas become decadent and less productive. We should have allowed some habitat management practices to continue.

The Badlands are a fragile ecosystem. Off road vehicles have caused damage to them. By becoming a wilderness area, I feel the BLM can better enforce ORV and protect critical Bighorn sheep, antelope, mule deer and elk habitat. This area requires little or no habitat manipulations.

On the other hand the Whiskey Mountain area can properly be managed by burning, fertilization, and reseeded low production areas. If it becomes wilderness, these options can not take place.

Our lands demand proper management and the abuse of them only decreases the resources. Let's identify these lands which are critical to wildlife and protect them.

Submitted by
Joe Bannell
Box 64
Dubois, WY 82513

Response to Letter 144

1. See Response 1 to Letter 15.
2. See general response to wilderness comments.

1. Wildlife habitats are amply protected without withdrawing them all from oil and gas leasing or mineral location. This plan contains a wide range of management measures recommended to do just that. For example, management units such as Whiskey Mountain and East Fork are recommended for withdrawal from locatable mineral exploration and development. The same two units would also be closed to oil and gas leasing with one possible exception. Other units have seasonal stipulations and the no-surface-occupancy restriction for oil and gas leasing to protect wildlife as well as other resources. The Preferred Alternative recommends the designation of some management units or portions thereof as Areas of Critical Environmental Concern (ACEC) in order to provide for special management attention to outstanding resource values, including wildlife.
2. As mentioned above, the Whiskey Mountain and East Fork Management Units now contain a Preferred Alternative recommendation for no oil and gas leasing with a possible exception if drainage should occur. See Response 1 to Letter 15.

The statement "Lease to the maximum extent possible" could, of course, be applied to all the resources in the plan if the term "lease" was changed to "protect," "enhance," "develop," etc. The plan is a multiple-use approach to get the maximum benefit possible from all resources.

3. It is certainly true that positive benefits can result from many fires. In this resource area, we have recommended over one million acres for a limited suppression policy, to reflect the fact that positive benefits can potentially accrue from some fires. However, there are many variables involved in decision-making concerning fires, such as: fuel type and amount; weather conditions; time of year of the burn, etc. For example, if a relatively large area of critical big-game winter range burned in the fall, this could potentially have an adverse effect on the big game herd dependent on this area.

As you have stated, the optimum situation would be to evaluate every fire on its own merits and use appropriate control techniques. However, with the present land status and amount of development existent in many areas, we do not always have this luxury. This agency is responsible to control fires started on BLM-administered lands before they spread to adjacent lands which are owned or administered by private parties.

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3

4

1. The plan is a multiple-use approach to get the maximum benefit possible from all resources. It is a multiple-use approach to get the maximum benefit possible from all resources.

2. The plan is a multiple-use approach to get the maximum benefit possible from all resources. It is a multiple-use approach to get the maximum benefit possible from all resources.

3. The plan is a multiple-use approach to get the maximum benefit possible from all resources. It is a multiple-use approach to get the maximum benefit possible from all resources.

4. The plan is a multiple-use approach to get the maximum benefit possible from all resources. It is a multiple-use approach to get the maximum benefit possible from all resources.

5. The plan is a multiple-use approach to get the maximum benefit possible from all resources. It is a multiple-use approach to get the maximum benefit possible from all resources.

February 5, 1986

District Manager
Bureau of Land Management
Tualatin District
P.O. Box 670
Tualatin, Oregon

Dear Sirs:

In answer to the B.L.M. Management Plan.

1. As a user of Public Grazing Land, my life of 50 years has been lived on rangeland. I can see many things not planned for and unanticipated in this plan.

2. The dead-end that will result with the B.L.M. land is the best and most productive land in the area. It is the best land in the area. The carrying capacity is 300 to 600 horses. However the B.L.M. gives no credit to this.

3. Riparian Areas. This is a tricky subject as most are on deeded lands. There are only a few areas in this study area that are in need of protection, most riparian areas would be removed if all grazing was not allowed.

In this locality the main danger to riparian areas are flash floods. These discharges are big and dry most of the time, however on occasions tremendous amounts of water run and there is no human way to control it unless through the use of riparian dikes which haven't proved satisfactory in the past.

4. Grass production naturally depends on moisture and conditions. The time period from April to May and June and favorable temperatures make ideal grass.

A good operator fluctuates the number of his cow herd accordingly.

5. Livestock grazing has been a viable resource in this area and to the state. With out it the population of the state would suffer. Oil, Gas, Minerals and grazing are the main basic resources and grazing is the only renewable one.

I have 3 allotments in this Copper Mountain Area.

To allotment number 1011, Glacier Road, I have made the following recommendations to the Leader B.L.M. Office.

- The Final RMP/EIS Preferred Alternative provides an off-road vehicle (ORV) closure to protect fragile soils and wildlife habitat.

The wilderness study for Dubois Badlands is planned for 1987. See general response to wilderness comments.

Response to Letter 213

- Private lands that have riparian and wet meadow areas were identified during the range survey field work. These higher producing range sites were included in the carrying capacity for each allotment. The private land production is considered in the tabulation of carrying capacity for grazing permits. Where unfenced land owned or controlled by the permittee is intermingled with public lands, the grazing permit recognizes that a proportional amount of grazing use will be made on the privately controlled lands. The permit indicates the total number of livestock to be grazed, the period(s) of use, and the percentage of use that is on public lands.
- Riparian areas are zones of transition from aquatic to terrestrial ecosystems, whose presence is dependent upon surface and/or subsurface water, and which reveal through their existing or potential soil-vegetation complex the influence of that water. Riparian areas may be associated with features such as lakes; reservoirs; estuaries; potholes; springs; bogs; wet meadows; muskegs; and ephemeral, intermittent, or perennial streams (BLM, 1985).

3 The sheep grazing permit is set for 10 to 15 years. April 20 and June 20th. This is the most crucial grazing season.

I want to fence my share of this allotment with red piping steel fence on part of it, followed by a post and rail. With the drilling of one more well I believe my share of this allotment would be in B category in 5 years, weather cooperating.

4 In allotment 1195 Lamé Jack, we do have a problem with water. We need water on the East side of this unit.

I do not have a well in Lamé Jack, so we drilled a few test holes which were deep. The well in the good type has recently dried but we need to try. I have developed an Artesian well and am "drilling". The turn out date are to dig down and then the elevation of water could be year in and year out in both allotments.

5 In allotment 1197 Haybarn Hill. All these allotments have 5 water-spreaders with cattle tanks. The ground is there so the red tape was at the right time, then we have for years the water is little I run between Antelope and Deer Herds.

I do want to fence a bigger pasture on dead-end land down the creek from the highway for a place to sell forest cattle through streams and calves.

Sincerely,

WILLIAM S. HANCOCK

William S. Hancock

635 W. Pavilion Rd., Rm. 630915
Pavillion WY 82523

Our best estimates indicate approximately 5,000 to 10,000 acres of riparian areas on public land within the Gas Hills Study Area or about .4 to .8 percent of the total public land. Meadow/riparian areas are generally the areas of heaviest use because of their high-quality forage and close proximity to water.

The operational waterspreader systems have been successful in slowing down water velocity and sedimentation in the large ephemeral drainages where they are located. The waterspreader systems which are not operational appear to have failed for two reasons: 1) lack of needed maintenance; and 2) very high water flows caused by exceptional rain or snowstorms which exceeded the capacity of the spreader system. These systems are very expensive to maintain, as well as to construct.

3. The proposed range improvements for the Shoshoni Road Allotment are to correct grazing management and range condition problems on this allotment. They were developed through consultation with both permittees in the allotment. Both sheep and cattle grazing occur during the crucial spring growing season on this allotment (April, May and June). Two electric water wells, 5 to 6 miles of pasture division fence and a deferred-rotation grazing system have been proposed to correct the livestock distribution, range condition and season of use problems on this allotment. No sagebrush spraying was proposed on the Shoshoni Road Allotment because of limited precipitation. The average annual precipitation is 8.2 inches. Sagebrush spraying, however, could be reconsidered when the Allotment Management Plan is developed.
4. One reservoir and one windmill have been proposed in the Lamé Jack Draw Allotment to help correct the livestock distribution problem due to lack of reliable water. Our range readiness information for the allotments immediately south of the Gas Hills Highway in the Green Mountain EIS area indicates that a 10 to 15 day delay in the current turnout date (May 1) is warranted. This evaluation is also based on 59 percent of the Lamé Jack Draw Allotment currently being in poor (2 percent) and fair (57 percent) range condition.
5. The Haybarn Hill Allotment has been categorized as a custodial category allotment mainly due to the limited improvement that can be made. The estimated present production is 1125 AUMs or 94 percent of the current authorized use of 1195 AUMs. Forty-four percent of the current range condition is satisfactory (good 38 percent and excellent 6 percent) and 56 percent is

unsatisfactory (poor 1 percent and fair 55 percent). The current fall-winter-early spring season of use should allow for at least maintenance and perhaps some improvement of the fair condition rangeland over the long term.

The proposed fenced pasture will be on private land and would not require authorization from the BLM. When the area is fenced, an upward adjustment in the percent of the Public Land Permit may be needed depending on the number of acres and AUMs involved.

216

John E. Swenson
P.O. Box 5534
Minneapolis, Minn. 55406

February 3, 1988

Bureau of Land Management
P.O. Box 589
Lander, Wyoming 82520

Dear Sirs:

Please accept my comments, as follows, concerning--

Draft Resource Management Plan--Drafts Environmental Impact Statement--Wilderness Supplement--Creating Supplement Lander Resource Area Bureau of Land Management.

I have been acquainted with this area of Wyoming for nearly fifty years, and continue to regard this portion as containing outstanding wilderness values, wildlife, fish, botanic and cultural resources of certain national significance. As such that provides a vital and as all Americans hope, a lasting refuge for man and for all life on this endangered planet. An area, then, that fully benefits man, and fully benefits all life, on this damaged earth. I wish to advise of my opposition to the preferred alternative, as such will designate below surface, surface, and above surface resources and, thus, will destroy this Lander Resource Area.

I recommend that as good citizens we save this resource area, and to do so by dedicating this area as a Preserve. This Lander Resource Area as a preserve.

Within all Units administered by the Bureau of Land Management United States Department of the Interior, dedicated as established Preserves. As the purpose of the Bureau of Land Management is to preserve all of the wilderness, wildlife, fish, botanic--all biological resources, cultural and scenic resources located on the areas administered by this Bureau of Land Management. With such such Preserve to protect ecosystems, preserve watersheds, save and enhance all wildlife, fish and botanic habitats--areas, protect and promote all biological resources and their diversity, preserve rivers and streams--streams, preserve--recover all undeveloped areas to their natural environmental condition, and to preserve, protect, strengthen and expand wilderness.

As wilderness is the foundation of all land and water resources. With the purpose of all land and water resources planning and management to preserve, protect, strengthen and expand wilderness.

I urge that the following areas and areas located on this Lander Resource Area as administered by the Bureau of Land Management, be fully classified and permanently protected as Wilderness, as each such unit features superb wilderness attributes, and to be included in our National Wilderness Preservation System at this time.

The original letter was handwritten
and has been retyped for legibility.

Response to Letter 216

1. Thank you for your comment.

Dubois Redlands 4907.
Whiskey Mountain 712
Copper Mountain 7677.
Sweetwater Canyon 15411.
Sweetwater Forks 38257.

Plus an additional 41,000 acres.

And with the program to recover--restore wilderness to gain another 476,000 acres.
To reserve a total of some 519,000 acres of wilderness to be located on this
Lander Resource Area--administered by the Bureau of Land Management and to be
included in our National Wilderness Preservation System, at this time.

To establish a program to restore--recover all rangeland resources to their
normal environment, as of the year of 1893. To include rivers and streams--creeks
in the National Wild and Scenic Rivers System, including for example, Snakewater
River. To establish this Lander Resource Area as a National Wildlife Biological
Preserve--National Critical Habitat Area. And to establish this Lander Resource
Area as a dedicated National Wilderness Wildlife Biological Preserve. With
this area's Preferred Alternative, as follows:

Alternative Preservation Wilderness Wildlife Biological Scenic Resources. And
to eliminate above surface, surface, and below surface activities and development.

To permanently ban all forms of surface and subsurface activities on all current,
proposed and potential wilderness.

With no release of any resource areas.

To acquire all inholdings on all public lands. With no disposal of any Public Lands.
For when we save our Natural Lands and Water;

We Save America!

Sincerely,

John E. Swenson



228

WYOMING CHAPTER
SIERRA CLUB

Route 42, Box 104
25 W. 13th Street
Suite 100, Cheyenne, WY 82001

Feb. 10, 1974

Jack Kelly
Lander Resource Area Review
P.O. Box 727
Lander, WY 82520

Dear Jack:

Attached are the Wyoming Chapter 1974-1975 minutes
on the Lander Resource Area. If you have any questions
or comments, please do not hesitate to contact me. Thank
you for your time and consideration.

Sincerely,

Jim Lee
Mike Gamble
Chairman

Response to Letter 228

1. The analyses of impacts caused by oil and gas activities is provided in Chapter IV and focused on important wildlife, scenic, and cultural values as well as other important surface values. The Preferred Alternative, selected because of these analyses, provides for a balanced or multiple-use between surface-disturbing activities (like oil and gas) and the protection of important surface values (like wildlife and recreation).

2. See Chapter I for information on alternatives considered.

The Preferred Alternative does maximize wildlife-recreation values while providing a balance with development. For example, mineral development is eliminated or restricted in those areas supporting significant wildlife and recreation related resources including big game winter ranges, recreation developments and important scenic, cultural, and natural history areas.

3. See Response 1 to Letter 15.

"Not blind opposition to progress, but opposition to blind progress."



228

WYOMING CHAPTER
SIERRA CLUBBox 44, Box 10
25 E. Main Street
South Park City, WY 82908

Feb. 23, 1986

Comments on the Under Resource
Area Draft RMP

The RMP focuses too heavily on oil and gas leasing and other extraction, consumptive uses, (response 15) of the land in the resource area for oil and gas development could adversely affect every other use of the land. The development of lands in certain areas will critically impact wildlife habitat, grazing, and recreation.

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"Not blind opposition to progress, but opposition to blind progress."

Wyoming Chapter Sierra Club
Under Resource Area Draft RMP

4. The RMP focuses too heavily on oil and gas leasing and other extraction, consumptive uses, (response 15) of the land in the resource area for oil and gas development could adversely affect every other use of the land. The development of lands in certain areas will critically impact wildlife habitat, grazing, and recreation.

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6. The RMP focuses too heavily on oil and gas leasing and other extraction, consumptive uses, (response 15) of the land in the resource area for oil and gas development could adversely affect every other use of the land. The development of lands in certain areas will critically impact wildlife habitat, grazing, and recreation.

7. The RMP focuses too heavily on oil and gas leasing and other extraction, consumptive uses, (response 15) of the land in the resource area for oil and gas development could adversely affect every other use of the land. The development of lands in certain areas will critically impact wildlife habitat, grazing, and recreation.

8. The RMP focuses too heavily on oil and gas leasing and other extraction, consumptive uses, (response 15) of the land in the resource area for oil and gas development could adversely affect every other use of the land. The development of lands in certain areas will critically impact wildlife habitat, grazing, and recreation.

9. The RMP focuses too heavily on oil and gas leasing and other extraction, consumptive uses, (response 15) of the land in the resource area for oil and gas development could adversely affect every other use of the land. The development of lands in certain areas will critically impact wildlife habitat, grazing, and recreation.

4. The Red Canyon and Lander Slope crucial wildlife habitats, which cover the Sinks Canyon Area, are adequately protected under the Preferred Alternative with the no-surface-occupancy restriction. The no-surface-occupancy restriction applies to riparian and aquatic habitats, steep slopes, the Red Canyon National Natural Landmark, and threatened and endangered species habitat. We believe that most of the crucial wildlife habitat is overlapped by these restrictions and will thus be protected from oil and gas development. The effectiveness of these restrictions makes a withdrawal unnecessary.

The use of reductions in livestock grazing and how they would be accomplished as a management action, is discussed in the Grazing Supplement. For discussion on converting allotment categories for No. 2124 and No. 2112, refer to Response 42 to Letter 563.

5. On all oil and gas leases, stipulations are included to protect wildlife. The critical big game winter ranges have been protected with no-surface-occupancy stipulations. The companies undertaking oil and gas exploration will use existing roads to the extent possible, so as little impact as possible will be felt.

In the fall of 1985, the BLM closed 13 roads on the top of Green Mountain. Some of these were logging or firewood roads and some were old seismograph trails kept open by hunters. These closures are part of an ongoing program of road closures in the area. The policy on logging roads is that after timber sale termination, the roads will be left open for 1 or 2 years to let firewood cutters remove the useable firewood, then the roads will be closed.

The increase in harvesting is due to a desire to salvage the dead and dying timber and to regenerate the cut areas to young, fast growing reproduction.

6. See Response 1 to Letter 15.

7. See general response to wilderness comments.

In summary, the BPO needs to place more emphasis on preserving the resource area's wildlife and recreational opportunities. In addition, more planning is necessary in order to determine where resource development may occur without impacting other uses of the land. Eventually, a "wildlife use" system to minimize the LAR Lander Resource Area is preferred to Section 10 of the plan for all and not development.

With regard to the wilderness designation, we believe that all of the Southgate Canyon, Sweetwater Flats, and Upper Mountain Area should be designated wilderness. With the exception of the southern end of Upper Mountain, the BPO fails to identify any resource conflicts. Conversely, the plan emphasizes the individual and beauty of these areas. Considering that there is no other major resource availability in the Lander Resource Area, are the only streams and riparian remnants of the late river basin, then I do not understand the BPO's position in recommending that these areas be developed.

The wording of some of the alternatives in the wilderness equivalent assessment of the Lander Resource Area is also concerning. For example, the preferred alternative for Sweetwater Flats and Upper Mountain is the "restoration of the present environment." Since these areas have always been "wilderness" and no resource development has ever occurred within their boundaries, we would naturally assume that the preferred alternative would retain the areas' wilderness status. Instead, "restoration of present wilderness" actually means that the Bureau should prevent activities which have never previously transpired on these lands. Thus, the wording of the alternative indicates that the BPO has never intended to remove these areas as wilderness.

In addition, the equivalent assessment implies that wilderness is not a suitable use. This is a fallacy. Recreation, wildlife, scientific and historical preservation, production of other values, hunting, clean air, and riparian are legitimate uses of a wilderness area. I do not believe that one can identify such suitable uses around an oil pit or a steel pipe. Finally, to remove biomass kill, or the resource area while preserving only 1% of the basin's natural habitat is totally unwise or multiple use management.

In a result of these various issues developed, the wilderness equivalent is characterized by contradictions. The Bureau approves the various plans, wildlife, and unique natural resources of Sweetwater Canyon and insists that the alternative wilderness characteristics of this area maintain its natural beauty of wilderness designation. Yet, the BPO expects 50% acres to remove a wildlife kill at never completely identified. This plan is evident in order to preserve the natural and visual integrity of one of the richest regions in Wyoming.

The agency cites two excellent sections in wilderness as the primary reason for rejecting all of Sweetwater Flats to backcountry. One argument is the limited use of this area. It would appear that the backcountry would be more important about the large holes in the natural world and in their own future than in extensive recreational visitation, which the BPO admits to be primarily dependent upon the fluctuating population of nearby activity. In fact, it means that the agency is leaving the way open to reduce a kill to insignificance.

I also believe that Sweetwater Flats justifies another alternative. Rather than choosing between all or no wilderness, the BPO should have divided a third alternative which encompasses the area of the area. Since the BPO supports wilderness designation for the entire area, a "core" alternative could provide some wilderness within the BPO, preserve, and enjoy interested parties.

In the analysis of the Upper Mountain area, the BPO shifts on the high potential for all and one on the southern end of this area. However, it fails to evaluate the recreational potential of this area. This is a particularly serious flaw considering that the Upper Mountain area and Upper Mountain are subject to Upper Mountain. More than 200,000 people visit this area every year. Considering this high recreational value and the overall higher value for deer and wildlife on the northern end and considering that all and one development can always occur on a vast majority of the resource area, we believe that Upper Mountain would be designated as wilderness.

In summary, the Wyoming Chapter believes that all six areas, and the Upper Mountain and Upper Mountain, should be designated wilderness. We cannot find these small previous wilderness anywhere else in the world. They should be used to develop these areas into a new system on 50% of the perimeter of the resource area.

Even though we believe that several wilderness exist, the BPO does have some wildlife agencies. The proposed management plan for the South Gate Wildlife Flats area is perhaps the best part of the plan. Recreation and wildlife management are the primary activities in the South Gate Wildlife Flats district. In fact, more than 20,000 people visited this area, primarily to enjoy the historic sites and to camp and hike. Also, this area is still the most active and vibrant region in Wyoming. Planning for wild even occurs in South Gate City during the summer. The BPO recognizes these important activities in devising a management plan that would preserve the cultural resource while allowing multi-use tourism operations to continue.

We strongly agree with the stipulation in the BPO that require plans of operation for all proposed future operations within the historic district. By requiring this plan, the BPO will ensure that future wild and historic important historical and archaeological resources. This policy in the management of balancing mining and recreation in the same area. Without it, mining from outside the local communities could destroy historical sites and significantly curtail the recreational potential of this area.

We also agree with the BPO that the Federal agency should continue the present mineral operations in the historic district, especially those in Sections 20 and 21, 78, 110, around the Corrie Shoshone Mine, and in the Upper Creek Canyon and South Gate Pass City to the Corrie Shoshone Mine. These operations will not only protect significant sites, but will also retain the visual integrity around the South Gate Pass City historical area.

We also support the BPO's desire to manage the historic district. We would like to maintain recreational opportunities in terms of public open space settings (p. 332). We also agree with the BPO's provisions to limit use to existing roads and that existing roads provide adequate access in the district.

Wyoming Chamber of Commerce
Lander Resource Area RFP Comments
Page Five

We commend the BLM for its appreciation for and desire to preserve Wyoming's historical heritage in the South Pass area and along the Mormon Trail. As I have already noted, we hope that the BLM withdraw these important areas from all and open development rather than allow leasing with BLM stipulations.

230

Dear Mr. Kelly,

1 I would like to express my concerns over your proposed resource management plan.

I feel very strongly that Wyoming has more than enough wilderness area and limited use areas. I feel that all such areas should be deleted from your plan. The land should be used for all people and not just a select few.

I urge you to give careful consideration to the feelings of the local people who must live with this plan on a daily basis versus individuals from other states who are nothing but letter writing pawns of environmental groups.

Your Atlantic City campground is the finest in the Lander area and is maintained in a superior condition. I would like to see the BLM expand their campground areas to other locations.

Sincerely,

Dan Moore
683 N. 8th
Lander WY
83320

The original letter was handwritten
and has been retyped for legibility.

Response to Letter 230

1. Thank you for your comments.

William G. Kline
P. O. Box 105
Silverton, 490-104
82901
February 12, 1966

Mr. Jack Kelly
Lander Resource Area Manager
P. O. Box 589
Lander, Wyoming
82500

Dear Sirs:

1 Industry made this mistake of ignoring what it is. The furrier, rancher, timber man, miner and the oil and coal industry have all contributed.

I note that the word industry does not appear in the Lander Resource Management Plan, Draft Environmental Impact Statement, nor any of its satellite reports.

I therefore request that your study be redone to include industry specifically.

Industry within the state of Wyoming, now includes many activities that are based upon those job producing industries that have. Previous year report would be less accurately true if it included the effect upon industry elsewhere and upon the industries of our neighboring states.

William G. Kline

Response to Letter 285

1. Thank you for your comment.

Page 1

Please accept the following comments on the draft Lander area Resource Management Plan/IS.

The BLM report to increase status, "BLM" makes more wildlife habitat than any other federal or state agency. The public lands are home to one out of every five live horn animals in the entire United States, including most of the caribou, brown and gray bears, desert bighorn sheep, moose, mule deer, and antelope. BLM also manages 17 million acres of wetlands, 15.4 million acres of riparian habitat, 323,000 miles of perennial streams, and nearly 1.2 million surface acres of lakes and reservoirs. These lands contain more than 16,000 miles of streams that support trout, salmon, and other sportfish. These trout and fishing opportunities offered on BLM land are numerous and impressive, but these opportunities need to increase as the demand for outdoor recreation increases. Today in Wyoming, a smaller number of sportmen and recreationalists feel they are not receiving a quality experience on public land. The report also demonstrates the BLM can best serve the public by placing management emphasis on wildlife and recreation.

1 One of the greatest faults of the draft resource management plan is the lack of alternatives which would increase wildlife and recreational opportunities. BLM, a critical wildlife habitat would be jeopardized for part of the plan is implemented as written. The most abundant example of this is the proposed oil and gas leasing with the stipulations of BLM lands on Whiskey Mountain, the Jackson, and the last fork oil winter range. Another example is the lease mineral interests on the Lander slope. These proposals are unacceptable. The idea to lease the entire 2.5 million acre Lander resource area for oil and gas is unreasonable and proposes to change the entire 2.5 million acres into oil and gas winter range. It is not in line with the multiple use concept when irreplaceable natural habitat and winter is jeopardized by using oil and gas exploration and development. The BLM stipulations are not adequate protection for wildlife and recreation.

The BLM has signed an agreement with the Wyoming Game and Fish Department

Response to Letter 286

1. See Response 1 to Letter 17.

Recommendations in the Preferred Alternative such as reintroduction of Bighorn sheep into the Sweetwater Rocks, access limitations within sensitive wildlife habitat areas throughout the resource area, consideration of sensitive tracts of land for transfer to the Wyoming Game and Fish Department (WGFD) or the U.S. Fish and Wildlife Service (USFWS) in the East Fork and Whiskey Mountain Management Units, avoidance of high value recreation, cultural, and wildlife areas by major utility systems, and oil and gas and mining restrictions in sensitive wildlife and recreational areas show that the RMP has dealt extensively with wildlife and recreational values.

Of special concern to BLM are the major wildlife values in the Whiskey Mountain, East Fork, and Red Canyon Management Units. We will continue to support wildlife management goals on BLM-administered lands and work with other involved management agencies. Please note that the Preferred Alternative has been changed in respect to

2

and the U.S. Fish and Wildlife Service to withdraw the East Fork elk winter range from oil/gas leasing. This agreement is still in effect. It is misleading and frustrating to spend time, energy, manpower, and money year after year in order to protect critical wildlife areas such as the East Fork elk winter range. The BLM is forcing extra work and a duplication of decisions by disregarding their agreement and proposition to lease the entire Lander resource areas.

3

Another serious fault of the draft resource plan lies in the grazing program. The resource supplement appendices show many ranges; allotments have no vegetative conditions rated as poor yet the allotments are overgrazed on 90% allotments. It is not fair to the public to manage their land in this manner. Now, during the planning stage, problem areas need to be identified and solutions proposed, on improvement of vegetative conditions will benefit livestock and wildlife alike. The BLM and many private lease holders are doing a good job on numerous allotments. This shows the job can be done right, more profits for the lease holder, and protect other resources. I urge the BLM to correct areas with resource problems and not continue with status quo management in problem areas.

Locatable Recommendations

4

1) Withdraw from oil/gas and mineral leasing BLM lands on the Shinarump Plateau, the West Fork winter range, the East Fork elk winter range, and all critical wildlife winter and birthing areas.

5

2) Transplant barren sheep into the Sweetwater flocks.

6

3) Increase resource allotment (20%) for possible ways to enhance barren sheep habitat.
4) Include all of the Sweetwater Mountain Ute into wilderness status.
5) Place the Dapper Mountains and Sweetwater Plateau Ute into BLM status with a stress on their wildlife and recreation resources.
6) Protect the unique scenery values of the Shinarump Plateau with either wilderness or BLM status. Withdraw the area from oil/gas and mineral leasing.

7

7) Each chapter in Federal law which would allow for more efficient management and less restrictions of wild horses. Wild horses should not be favored over wildlife or domestic livestock.

8

8) The transportation system should be examined for:
(a) ways to increase public access to public lands.
(b) cleanup and rehabilitation roads which duplicate or harm other resources.
(c) ways of marking and posting some identified BLM lands.

Typed name
Terry Taylor
Terry Taylor
Spring House
Tobacco, W. 10513

oil and gas leasing in the East Fork and Whiskey Mountain Management Units due to public comment. See Response 1 to Letter 15 for more information.

Also please note that the Preferred Alternative has been modified to include Areas of Critical Environmental Concern (ACEC) designations for the East Fork and Whiskey Mountain Management Units and for parts of the Green Mountain, Beaver Creek, and Gas Hills Management Units. These ACEC recommendations are in addition to the areas already mentioned in the Draft RMP/EIS.

All of the areas recommended for ACEC designation including Red Canyon and Lander Slope, which you mentioned as areas of concern, would receive special management attention because of outstanding resource values. One form of special management attention stemming from ACEC designation would be locatable mineral restrictions. These restrictions would take the form of plan of operations requirements for all mining operations. Plans of operation provide BLM with more management flexibility and discretion in order to protect public lands from undue degradation. The requirement for plans of operation was recommended for the Red Canyon and Lander Slope Management Units because the areas have a low favorability for the occurrence of locatable minerals making withdrawal of the areas unnecessary to adequately protect the unit's sensitive values.

BLM does not lease public lands for locatable mineral resources. Locatable minerals are defined in the Draft RMP/EIS and BLM's management role is also explained. The Lander Slope Management Unit, under the Preferred Alternative, would become an ACEC and as such, any surface disturbances proposed by locatable mineral activities would have to be approved under a Plan of Operations. The Plan of Operations would provide the BLM with more management control to protect the public lands from unnecessary and undue degradation. Due to a low favorability for the occurrence of locatable minerals in the Lander Slope Management Unit, we do not feel a withdrawal is necessary and surface resources could be protected by enforcing the regulations for locatable minerals.

2. See Response 1 to Letter 15.

3. There are 51 M category allotments within the Gas Hills Study Area encompassing 581,427 public land acres. There are an estimated 13,000 acres of public land in poor condition on these 51 M allotments. This poor condition land comprises 2.2 percent of the total public land in the M category. We believe it is insignificant.

nificant compared to the total area. Also, M category allotments can have management actions implemented on them to correct problem areas. However, the M category allotments will have a lower priority for implementation of actions than I category allotments.

4. The Whiskey Mountain Bighorn Sheep Winter Range and the East Fork Elk Winter Range are recommended for a locatable mineral withdrawal in the Preferred Alternative. The areas would be closed to oil and gas activities and to exploration and development of locatable minerals. See Response 1 to Letter 15 for more information.

All the other resource management units have recommendations for oil and gas leasing restrictions that would protect wildlife winter and birthing areas along with other resource values that need and deserve such measures. In addition, there are also restrictions on locatable mineral exploration and development and phosphate leasing in the pertinent management units to protect wildlife values as well as other resources.

5. The Wyoming Game and Fish Department (WGFD) has the ultimate responsibility for carrying on any bighorn sheep transplant. The Bureau believes that there is adequate habitat available for a bighorn reintroduction in the Sweetwater Rocks and will work with the WGFD and other parties to see that a workable program is developed.
6. See general response to wilderness comments.
7. Wild horses are not favored over wildlife or domestic livestock in our management decisions. These decisions are explained in the Green Mountain Rangeland Program Summary (RPS) in Appendix A of the Draft Grazing Supplement. They are consistent with applicable federal laws and regulations.
8. We will continually be looking at ways to improve public access to public lands and ways of marking and posting signs identifying BLM lands. Roads which duplicate or harm other resources will be closed and obliterated as funding and manpower permit.

February 12, 1986

Jack Kelly, Manager
Lander Resource Area

I would like to comment on the R&P plan of the Lander Resource Area.

I am for the multiple uses of the resources of this area, with as little damage as possible. However, we must realize that the people Wyoming must survive in this area. The area belongs to all the people of this Nation, but they require us, the people of Wyoming to provide service, such as roads, utilities and things to make their stay in this area comfortable.

To do this, any reasonable person must know there has to be changes in these areas. They cannot be the same as they were 100 years ago. They are not now and they are they never will be again, even if every person were kept out of these areas.

I oppose making any more wilderness areas on BLM land or forest land.

I believe the BLM, in recent years has been doing a much better job in managing and in public relations, at least in this area.

I believe the BLM is trying to get more public input in this area by freely providing information which has not been done in the past.

The original letter was handwritten
and has been retyped for legibility.

Response to Letter 291

1. The Wyoming Recreation Commission (WRC) has not requested permission to modify the plan of development related to Recreation and Public Purpose Act (R&PP), Lease W-49773, to construct a new road, bridge, and parking lot. Therefore, we have not had an opportunity to analyze potential impacts of such activities. The WRC has not indicated that they have any immediate plans to apply for patent on these lands. They have applied to patent a portion of the existing lease located to the east of the area you are concerned about. Your concern regarding preservation of the historical integrity of the area will be considered in future actions in the vicinity of South Pass City. The public will have a chance to express their views on any proposals.

1

This is greatly appreciated by me and many others that I have been in contact with. One more thing I would like to comment on is the area which I have private property, South Pass City. I'd like to see the BLM retain ownership of the lands around South Pass City, and not allow the developments to destroy the historicity of this area, such as the changing the historic road through the town and the proposed parking lot and steel bridge which is not needed and is not historical in either location or structure. There are to be built on BLM property.

If these are allowed to be built on BLM property, it will forever scar the pristine setting of historic South Pass City.

The BLM can stop this ravaging of this pristine area, if they will.

It would be a service to the people of Wyoming and the rest of the United States I believe improvements should be made on public lands, and should be made, if needed, but to make a parking and road 300 feet from the present road, in a pristine area of South Pass City is a crime against this Country, and should not be allowed.

By transferring these properties to another bureaucratic agency so they can do these things is not good land management for the people of Wyoming, and the

United States. If these lands are transferred, they should have covenants attached to protect the historic association of this area.

Thank You.

Bill Lowe

65 Main St.

South Pass City NV

82520

Response to Letter 294

1. Thank you for your comment. The Final EIS has been modified.
2. See Response 1 to Letter 15.
3. The condition of riparian areas are considered when allotment categories are assessed.

Range conditions for individual allotments are in the Final Grazing Supplement.

Alternative A proposes two actions that provide for riparian area management. Where the distribution of grazing animals is not satisfactory because significant problems exist from livestock concentrating around wetlands, riparian areas and meadows; the first management action would be to implement grazing systems and/or range improvements to solve the concentration problems. Specific management objectives would be established in the Allotment Management Plan (AMP) for allowable utilization levels on these key areas where they are on public land. Further, total exclusion by fencing out the livestock for several (3-5) years would be implemented on riparian areas that were not recovering under the grazing system. However, BLM would be able to improve conditions on only about 1 percent of the riparian areas in the Lander Resource Area since the vast majority is on private land.

The second management action proposed is to delay turnout dates and/or season of use for livestock to provide for range readiness. This management action incorporates the range management principle that livestock grazing would be delayed in the spring until the soil was firm and dry enough to avoid significant soil damage. Reducing livestock trampling would reduce soil compaction, increase soil structure stability, increase soil infiltration, and increase plant litter accumulation. These positive impacts would be more evident on heavier soils along streams, in meadows, and on steeper slopes.

Studies that appear in range management and related journals indicate that if cattle have any access at all to water they tend to spend most of their time there. The particular slope, erodibility, and forage of an area determines how far from water you can expect cattle to graze.

4. Based on public comment and consultation with the U.S. Forest Service, the decision for full suppression in the Whiskey Mountain, East Fork, and the Dubois areas has been changed to limited suppression. This will make the fire program compatible with the policy on adjacent USFS-administered lands. As you stated, this will also have the potential of enhancing the sheep habitat in this area.

294



Audubon Ecology Camp in the West

National Audubon Society

410 DARLEY, SUITE 3, BOULDER, COLORADO 80501 (303) 449-5400
SUMMER - TRAIL LAKE RANCH, DUBOIS, WY 82511 (307) 435-2427

8 February, 1986

Jack Kelly
Lander Resource Area Manager
P.O. Box 589
Lander, WY. 82520

Please accept the following comments on the Draft Resource Management Plan/Environmental Impact Statement for the Lander Resource Area as concerns of the National Audubon Society. One of our four educational facilities is operated within the area encompassed by this plan (brochure enclosed). We have selected this site for the program because of the outstanding wildlife, scenic, and wilderness values associated with the site. We are located on hunting lands and fish property through lease arrangements with the University of Wyoming. We are a non-profit educational with the annual program participation of 250 to 300 people is important to the local economy.

These comments will concentrate on 3 units - Whiskey Basin, Dubois Badlands, and East Fork.

1. On page 134 you list hunting, camping, wildlife and snowmobiling for units. I would add to this list horseback riding, hiking, and outdoor education. The latter two activities are crucial to our program in the Torrey Rim area. If you are in need of the information I can supply you maps and user days. After 4 years residence year-round in the area I do not agree that snowmobiling is a major recreation activity. Snow conditions are poor at best, and the surrounding area towards Topotsee Pass draws local use away from these poor-quality areas. Many of the roads are seasonally closed and do not encourage this activity.
2. Our major objection to this plan concerns the overall emphasis on oil and gas leasing. On page 101, the table lists 35 high-potential for all 3 areas and under 35 for moderate. Yet it lists wildlife values as both critical and important repeatedly. It seems only expedient management to close these areas to oil and gas leasing as you have recommended for locatable minerals. These two designations should be correlated in the evaluation of their effects. The drain in time and money to administer these even with no surface occupancy protection is counterproductive when evidence for negative wildlife impacts is so obvious. Public sentiment, as evidenced in 1982 when we had the chance to comment on a Torrey Rim lease is against leasing. We recommend a no-lease option for these AMERICANS COMMITTED TO CONSERVATION

2. 3 areas, and comment you for recommending such for the badlands area. No surface occupancy is not enough protection for the wildlife. Aesthetic and educational resources since it can be changed administratively without public comment. In addition, the network of private lands that occur in the area may allow or even encourage development from these private lands, and create a negative impact on the public resource base. Even in the broad concept of multiple use your document proposes widespread support for the oil and gas industry without providing protection for the other resources you are by law responsible to manage. The BLM should be required to develop a minimize future land-use conflict at a time when management dollars are tight. It is economically expedient to close these areas to leasing.

3. Riparian vegetation offers productive habitat for both game and non-game species. We do not find adequate protection for this habitat under your grazing statement on page 27, while on page 19 of the grazing supplement you state the riparian habitat as both habitat used and most productive part of an area for domestic livestock. The condition of riparian areas should receive attention when categories are assessed. Category I designations should be used as a management tool to see that these areas are restored. Without knowing the range conditions on individual allotments it is difficult to comment on other specifics, other than that a sound management plan should be initiated to restore and maintain quality rangelands. You state the problem, yet no solutions.

4. We are confused by your position on fire, especially when fire has proved to be a valuable tool on opening up winter range for bighorn sheep. Full suppression does not seem to be in accord with wildlife goals of the Wyoming Game and Fish as you state, and this agency should be consulted for their recommendation on this. Many of the Whiskey Basin unit boundaries on Forest Service land border wilderness areas and thus you would not endanger their management objectives by a low suppression plan. A blanket statement of full suppression seems archaic in light of what we know ecologically to be the value of fire as a management tool. This should be reviewed by qualified people.

5. In accord with surface disturbance concerns, phosphate leasing should be limited to competitive leasing, and should follow case by case recommendations by Wyoming Game and Fish when such lease applications occur on winter range. (page 27 - industry discretion).

6. You seem well aware of the habitat degradation that has plagued our public lands (pages 188 and 189 - habitat losses, and pages 33 and 34 grazing supplement- potential improvements, page 327 - alternative A - benefits of closure to wildlife). We strongly urge you to see that these resources be protected under your administration. We support your recommendations on OLV use and its restrictions. We support your stance on access. We encourage sound grazing management and lease closures to oil and gas as well as locatable minerals on critical wildlife winter range.

In all management units, we have reserved the option of utilizing prescribed burns for enhancing the resources.

5. Leasing of phosphate resources in the Lander Resource Area, particularly the Beaver Creek, Red Canyon and Lander Slope Management Units, would be primarily by competitive means. The lands are presently being classified as Known Phosphate Leasing Areas (KPLAs) where such classifications are appropriate. If insufficient data is available and lands cannot be classified as KPLAs, then certain lands would be open to prospecting which can lead eventually to preference right leases. Before any leases or prospecting permits could be issued, an environmental study or assessment would be completed and the BLM would request recommendations from several concerns, including the Wyoming Game and Fish Department.
6. Thank you for your comment.

On the Dubois unit we are very much in support of the plan to analyse the warm Springs Canyon area and to restore the cultural resources there. On the land exchange suggestions we would like to see Wyoming Game and Fish have first option on those areas that border winter range.

We have restricted our comments to local areas that we are familiar with, but extend the management objective comments to the entire Lander Resource Area.

Thank you for your time and concern, and the efforts involved in this document.

Sincerely,

Margaret C. Abbott

Margaret C. Abbott
Director, Audubon Camp in the West
National Audubon Society.



Roberts Anderson
Point Land Coordinator
February 10, 1986

Mr. Jack Kelly
Area Manager
Lander Resource Area
Bureau of Land Management
P. O. Box 518
Lander, WY 82520

Dear Mr. Kelly:

Anoco Production Company is a subsidiary of Amoco Corporation. The Denver Region has the responsibility for finding and producing oil and gas throughout the western United States. Because we hold a substantial number of federal oil and gas leases, we have a great interest in federal land planning processes. We are pleased to have the opportunity to comment on the draft BLM/BLM and Wilderness Supplement for the resource area.

Anoco Production Company has made efforts, during the planning process, to establish information exchange programs concerning geologic favorability of lands within the resource area for potential hydrocarbon production. Obviously BLM has paid a great deal of attention to the very prolific nature of the 3A for energy and mineral production. We are especially pleased that the preferred alternative emphasizes energy and mineral exploration and development opportunities. We support the preferred alternative, and appreciate the fact that the energy industry is given credit for having the ability and commitment to mitigate certain conditions perceived by some to be adverse impacts, and to work to protect other surface resources.

Anoco Production Company is encouraged by this spirit of cooperation since our employees continually look at new technology, new information, and new methods to improve all aspects of our search for oil and gas. Federal managers who see fit to allow flexibility and innovation are obviously far ahead of those who let fear of possible adverse impacts control their planning.

1 It is clear in the plan that areas of "high geologic potential are afforded top consideration for energy production. With 43 fields and 10 NGS in the 3A, it isn't hard to see why this is so. Table 4-1, "Percent of Total Wells Drilled . . ." (p. 191)

Mr. Jack Kelly

-2-

February 10, 1986

1 indicates that many wells were drilled in areas thought to have "moderate potential". Thus, we believe BLM should adopt the same standards of priority for oil and gas exploration and development in moderate-potential areas as have been adopted in high-potential areas.

The Company wishes to make it clear that its personnel fully understand the need for protecting the environment and safeguarding opportunities for the many other uses of federal lands. We believe our activities are environmentally compatible, short-term, and repeatable, and we appreciate being given opportunities to prove this is so.

Wyoming has more than three million acres of designated wilderness within its borders. Therefore, additional wilderness considerations must be very carefully evaluated in terms of need. We believe it is irresponsible planning to recommend areas for wilderness designation merely because they may be suitable, but without regard to other areas designated or under study.

2 We note the plan contains little discussion of the Oregon and Mormon Pioneer National Historic Trails, especially with reference to the planning documents written for the Trails and released in draft form in 1981. Specific reference or incorporation of trail planning should be contained in the Plan, the Resource, and Lander RMPs. The management decisions in the Trails Plan may specifically impact management prescriptions in the Lander RMP. The proposed Trails Plan adds an additional layer to restrictions to legitimate operations which is unnecessary and redundant. For example, a 4-mile buffer zone on either side of the trails or a visual horizon is unreasonable. Such buffers could easily make re-routing pipelines or other rights-of-way hundreds of thousands of acres from surface occupancy for energy use. There are existing operations within 100 feet of segments of the Oregon Trail, which cause no impacts to the Trail. When such examples of compatible uses exist, there is no logical reason to further constrain activities near the trails.

As you are aware, Anoco Production Company is very active in the Lander Resource Area. We look forward to a continuing good relationship. Thank you again for the opportunity to comment on the draft RMP.

Sincerely,

John L. Anderson
J. L. Anderson

RGA:ad

Response to Letter 296

1. See Response 1 to Letter 12.
2. See Response 4 to Letter 12.



(207)
833-3416

WYOMING OUTDOOR COUNCIL
P.O. Box 1184 1600 Capitol Cheyenne, WY 82002

February 12, 1986



Mr. Jack Kelly
Lander Resource Area Manager
Post Office Box 688
Lander, WY 82520

Dear Jack:

I have reviewed the draft Resource Management Plan for the Lander Resource Area from covers to covers, where it is a great deal of information that is very well presented and helpful. You are to be especially commended for your treatment of the historical and cultural aspects.

1. No protest disagreement with the plan lies in the alternatives presented. The four alternatives were, first, land closure, all covering extensive mineral development. The time shown is here and there on what might happen to utilize or preservation or wilderness of the other resource given the development of oil and gas and minerals is very given today's social awareness of our environment (and subject matter) I feel that it would be fitting to consider the additional alternatives:

2. A Federal budget alternative that will decrease substantially over the next several years or until the deficit problem is resolved or alleviated. What will this action do to resource development or use?

3. An alternative where wildlife and recreation resources are given a substantially greater role in the management scheme. What effect will this action have on the economy, and on consumptive or non-consumptive users?

One of the problems that this area has faced economically, is that we have been on a roller-coaster cycle with oil and gas and minerals for

continuum....

Mr. Jack Kelly,
Page 2 of 2
February 12, 1986

every year and there is a substantial portion of our production that feels the economy should be stabilized in one or another of that these cycles are leveling out at least to some extent. I, for one, believe that wildlife and recreation are two resources that can contribute significantly to this leveling process.

2. I find the tract very unacceptable when it states that "Practically every acre in the area will be available for oil and gas and mineral development even with the caveat that a co-processor over time, utilization would be equitable in specific areas." I had still, still, still, more than an administrative decision that can be justified tomorrow by any administration. A Congressional order is a much better way to be such a reference.

In the matter of the BLM, it is my contention that all of the time should go forward and be presented to the Congress for wilderness designation. Your arguments concerning wilderness and Lander Resource Area have been well presented but are, however, the lands are different enough, extremely, unlike any and so a different way, we can receive the highest protection that can be obtained. In at some future time it is found that there are resources on these lands that are necessary for national security or some higher national purpose, we can then always change it's land status.

2. There are other areas besides the LRA that should receive greater management emphasis for wildlife, water, soil and recreation. These areas include but are not limited to: Green Mountain, the Big Horn, the Lander Front, East Fork the Lander Plateau and the Snake Channel. Oil and gas and mineral activity should not be permitted in these or similar areas or if there are valid scientific, historic, or prehistoric, or other reasons why it is better to be in one or another or several, or all project. The surface resources in these areas are a nucleus that will grow into a much more extensive and healthy environment. It is a much better idea to live with a healthier environment. It is a much better idea to live with a healthier environment. It is a much better idea to live with a healthier environment. It is a much better idea to live with a healthier environment.

Our lands are under great stress from increased population, better technology, acid rain, and a variety of other factors. It behooves us all to work together so that we have on a pleasant place to live for our descendants. Thank you for the opportunity to comment on this plan.

Sincerely,

Robert L. Evans
Board Member
Wyoming Outdoor Council

Response to Letter 297

1. See Response 1 to Letter 17.
2. See Response 1 to Letter 15.

February 22, 1986

Bureau of Land Management
 Lander Resource Area
 P. O. Box 589
 Lander, Wyoming 82526

Dear Mr. Kelly:

This letter contains my comments about the Draft Resource Management Plan and E.I.S. for the Lander Resource Area, that is currently being reviewed.

The Wilderness study areas and your proposed management of these areas raises a lot of issues to me. I do not feel that wilderness designation for any of the areas studied, including Sweetwater Canyon, would offer any advantages to the public or to the people managing these areas. I do not believe that any of the areas studied would generate much, if any usage by out of state people. Local people will be much more able to use these areas if they are not locked up under a restrictive wilderness designation. Management problems in these areas, such as wildland fires, overgrazing, and severe erosion can be controlled much easier under less restrictive management options.

The other area of the plan that I wish to comment on specifically is, the Timber Reserve. I believe that your proposed management alternative for this resource is an excellent one. It proposes full usage of the timber base in this area without any undue compromises in good long term management goals.

In general I believe that Federal Lander Managers must better address the needs of the local economies, who depend heavily on the resources these managers control.

Sincerely,

Patrick C. Hickerson
 President

Response to Letter 298

1. Thank you for your comments.

306

1. I am opposed to any more wilderness or limited use areas being designated in the Lander Resource Area.

Why wasn't this proposal publicized in our area??

L. Cowling
 POB 1532
 Lander WY

Response to Letter 306

1. See Response 2 to Letter 17.

The original letter was handwritten
 and has been retyped for legibility.

Mr. Jack Kelly
Lander Resource Area Manager
Box 569
Lander, Wyoming 82520

Dear Mr. Kelly,

Thank you for the opportunity to comment on the Resource Management Plan for the Lander Resource Area. In general, the plan is a good one, so I am constrained to limit my comments accordingly with minor exceptions.

EAST FORK MANAGEMENT UNIT & WHISKEY MOUNTAIN MANAGEMENT UNIT

(OIL & GAS)

1. I believe that the best management description for the East Fork elk and sheep range and the Whiskey Mountain sheep range is the complete WITHDRAWAL of the area for oil and gas exploration and leasing. Leasing stipulations with "no surface occupancy" do not guarantee absolute protection of critical wildlife habitat. Further, seismic or other forms of exploration is not prohibited. In the event of a major discovery, subsequent development may allow for surface occupancy and thereby cause irreversible loss of habitat. The East Fork BLM herd and the Whiskey Mountain Bighorn Sheep herd and the winter range they use is an established long term benefit to Dubois, Wyoming and the rest of the nation. Sound management practice would prioritize this established long term renewable resource over a questionable nonrenewable subsurface resource.

(FISH & WILDLIFE)

Given the preferred alternative for oil and gas, I question the ability of the BLM to meet Wyoming Game and Fish management objectives for habitat improvement and enhancement. The opportunity for oil and gas development may become less due to recent falling world oil prices, thereby increasing the opportunity for Fish and Wildlife activity. A strong fish and wildlife program will benefit Dubois in the long run as the area charts a stable economic course for the future through enhancement of wildlife and recreation opportunities and associated benefits.

(LAND OWNERSHIP/ADJUSTMENTS)

2. Priority consideration of potential sale or trade should be given to the Wyoming Game and Fish. The comment that sale or trade to state or public agencies and private organizations is not prohibited. At this time, I am unable to think of a private organization, who through ownership of additional public land in the East Fork winter range area or the Whiskey Mountain Bighorn Sheep range would constitute use consistent with Game and Fish management objectives. Sale of any land to existing operations in the area may create additional landowner-game and fish, landowner-public conflicts.

(RECREATION/D R V MANAGEMENT)

3. The management plan needs to be more specific as to monitoring and enforcement of recreation and ORV abuses. At this writing off-road vehicles are fairly common over the East Fork area, Whiskey Mountain area, and the Dubois Badlands. I would like to see a published inventory of roads access, and allowed ORV use along with means enforcement and penalties for off-road violations.

(FIRE MANAGEMENT)

4. Full suppression of non-prescribed fire is generally acceptable, however is there a provision for use of fire management by the Wyoming Game and Fish in cooperation with other land agencies for wildlife and range habitat improvements? Fire management, given the right set of circumstances, could prove to be a valuable habitat and range tool.

(ACCESS)

5. I believe adequate public access is in place for these two areas. If the much pressure is put on the Big Horn Sheep herd by public viewing, I would like to see some alternative addressed early on in the plan to provide adequate public access and viewing opportunities of Bighorn Sheep while minimizing against potentially stressful situations for the sheep caused by increasing demand for this type of non-consumptive wildlife use.

DUBOIS MANAGEMENT UNIT

6. At this time, I cannot foresee any real problem with the management direction for the greater Dubois Management area. Many leisure-oriented and retirement types of individuals are moving to the Dubois Area because of its somewhat scenery among other attributes. Any major oil use activity should be closely scrutinized and an intense effort by the BLM to involve the public in oil company APDs should be undertaken. If special concern in the Dubois area is air and water quality, visual, wildlife, agriculture, and recreation, large-scale oil use activity is potentially very disruptive to these in place values.

7. I am interested in any long term proposals which would, in cooperation with the Forest Service and private landowners, seek to further study and preserve the cultural/natural history resource of the Tie Road area near Spruce Canyon Flume. Listing in the National Register and subsequent restoration programs and potential access to the above area from an economic, educational, and recreational standpoint.

I also support, under the Recreation and Public Purpose act, current proposals for location of a shooting facility for the Dubois area.

(ACCESS)

8. Sufficient access already exists for most public lands in the Dubois Management unit. I am opposed to creating for access to public lands via the Teton Creek road. The BLM and Forest Service lands lie along the important elk migration route and creating additional access to the above area from an economic, educational, and recreational standpoint.

Response to Letter 318

1. See Response 1 to Letter 15.
2. The wording in the text of the Resource Management Plan was purposefully written so as not to constrain disposal to any entities which could ensure that the lands would continue to be managed for wildlife habitat. An example of a private organization is The Nature Conservancy which is a national private corporation group that works to preserve and protect unique and high value lands.
3. This RMP is limited to the overall designation needed for an area. BLM will follow-up on the RMP decisions with an off-road vehicle (ORV) management plan which deals with the details of management on-the-ground that you refer to. ORV travel maps are also published following plan approval.
4. See Response 4 to Letter 294. There is no specific provision in the RMP for the Wyoming Game and Fish Department (WGFD) to undertake habitat treatments on BLM-administered lands. However, BLM has cooperated with the WGFD and other agencies on habitat treatment (including fire management) in the past, and we expect to continue to do so again in the future. As with these types of projects, BLM will follow proper environmental protection guidelines and secure proper permits from concerned regulatory agencies prior to conducting these treatments.
5. The Preferred Alternative does not propose to change the access situation in this area. Any actions BLM will take in the area of access development will be closely coordinated with the Whiskey Mountain Bighorn Sheep Technical Committee comprised of BLM, Wyoming Game and Fish Department and U.S. Forest Service personnel. Access will be managed to minimize impacts to the wintering sheep herd while maintaining opportunities for the public to view the sheep on their natural winter range.
6. Any large scale oil and gas activity which would be considered highly disruptive to surface resource values in the Dubois area would require BLM to prepare an environmental document and to solicit public input.
7. The Preferred Alternative for the Dubois Area Management Unit details direction for the Warm Springs Canyon Flume. A management plan will be written for the portions of the canyon on BLM-administered land. A standard procedure in developing plans such as this is an effort to harmonize BLM's management with adjacent landowners (i.e. the Forest Service and private landowners).

9

Since environmental consequences of Wilderness Designation for the SWEETWATER ROCKS COMPLEX are minimal and will maximize most values with the exception of federal minerals, I favor full wilderness designation. I am disappointed in the lack of BLM designated wilderness in Wyoming, and personally feel that some very outstanding and pristine areas under the jurisdiction of the BLM occur in Wyoming and thereby warrant more consideration than has been given in the past.

10

The BLM Resource Management Plan demonstrates a wide variety of resource use accommodation in the Lander Resource area. Problems may result due to conflicts of resource use. A SOUND MONITORING program could overcome these problems, yet monitoring is often the weakest part of any management plan. Successful monitoring requires a high degree of cooperation and plan and greater public confidence in the ability of the BLM to administer public lands hinges on the agency's ability to monitor. I recommend that a detailed monitoring plan similar to the one in the Lander Resource area be developed. This plan should include the following: (1) a grazing supplement to the BLM's monitoring plan; (2) a plan to incorporate specific agency management reactions to conflicts by resource; (3) the monitoring plan should also detail monitoring procedures; (4) the monitoring plan should include a detailed schedule of potential effects of grazing on resources; (5) the monitoring plan should include a detailed budgetary and manpower schedule.

Michael J. Kennedy

Box 374
Dubois WY 82519

8. Public access into the Tappan Creek area would not conflict with the elk migration because BLM would seasonally close the road to avoid possible conflicts.

9. See Response 1 to Letter 15. Dubois Badlands will be managed under BLM's Wilderness Interim Management Policy (IMP), as long as it is a study area. The area is signed and patrolled on a regular basis.

Some habitat improvement projects for wildlife are allowed under wilderness IMP as long as they meet the wilderness nonimpairment criteria.

Additional information has been added to Chapter V that addresses ACEC designation.

10. As the plan states in the Chapter 1 Introduction, "Monitoring the Plan for the Lander Resource Area will be carried out from the time the plan is implemented until changing conditions require a revision of the plan or any portion of it." Each of the resource issues discussed in the plan has at least one specialist in the Lander Resource Area office who is responsible for that particular resource. The specialists work daily with the resource and its users, revealing any resource conflicts and the possible need to revise this plan.

344

1 | Mr. Kelly:

I disapprove of BCP Land plan for the Lander Resource Area.

Tecia Hubble
365 Del
Lander WI 62520

The original letter was handwritten
and has been retyped for legibility.

Response to Letter 344

1. Thank you for your comment.

345

1 | Mr. Kelly:

I disapprove of BLM Land plan for the Lander Resource Area.

Devin Hubble
365 Del
Lander NY R2520

The original letter was handwritten
and has been retyped for legibility.

Response to Letter 345

1. Thank you for your comment.



14 Feb 1986
Lander, WY 82520

Lander Resource Manager
P. O. Box 589
Lander, WY 82520

Dear Mr. Jack Kelly:

We generally commend the Bureau of Land Management for having published such a thorough thoughtfully, and comprehensive Draft Environmental Impact Statement. It represents many resources of work and consideration.

We offer the following comments and observations concerning the plan.

1. Chronic overgrazing is a fact of life on many acres of the public lands. It is only reasonable to recognize that political constraints limit what the BLM can do to reduce or alleviate this deterioration of the range. Nevertheless, the proposed action appears to be the best that can be accomplished under these constraints. However, question the need for 45 to 55 miles of additional fencing. Fencing is generally seen as detrimental to wildlife habitat and other values.
 2. We applaud all management plans to limit off-road use to existing roads and vehicle routes and especially protecting Castle Gardens area. We also heartily endorse the recreation plan for the Oregon-Nevada Trail.
- We question whether there should be an all-out oil and gas leasing program "to the maximum extent possible." Much more alternative plan which would result in the least impact and the most protection for all other multiple uses would be preferred. It is difficult to determine or forecast if that would occur under Alternatives A or B.
- We heartily endorse the proposed action to designate Sweetwater Canyon as a wilderness area, but we question the decision to not designate the Sweetwater Rocks. We can sympathize with the BLM in having to deal with possible access and trespass problems, yet it seems within the realm of possibility to someday use land exchanges to block out areas to alienate these problems.
- Wilderness is the most conservative multiple use of land. We would rather see a management error, if any, to be on the side of generosity. This strengthens our recommendation to include Sweetwater Rocks in the wilderness designation. Again, we appreciate your effort in the preparation of the report and thank you for the opportunity to comment on it.

Sincerely,

Charles H. Nations
Charles H. Nations, President

Charles H. Nations
330 Grand View
Lander, WY 82520

Response to Letter 346

1. Fencing can be used as an effective management tool to control livestock and improve vegetative resource conditions for both livestock and wildlife habitat. There are several references cited in the Draft RMP/EIS (page 445), that bear this out. All fencing is coordinated and developed with review from the Wyoming Game and Fish Department under a memorandum of understanding.
2. Although a maximum of acreage would be leased and provided for development purposes, the BLM would still maintain management control of public land resources and would provide for their protection as identified in this plan and as mandated by law. See Response 1 to Letter 15.

TABLE MOUNTAIN RANCH

Rt. 63, Box 105, Lander, Wyoming 82520

347

(307) 332 9294

February 17, 1986

Mr. Jack Kelly
Lander Resource Area Manager
Lander, Wyoming

Dear Mr. Kelly:

Thank you for providing copies of the Lander RMP/EIS study, and an opportunity to comment on them. The comments below are based on this material, other pertinent published materials, attendance at two public meetings in Lander on the subject, discussion with knowledgeable people in Fremont County and Laramie, and personal experience. Good luck on further development of this comprehensive plan.

Respectfully,

David R. Reynolds
David R. Reynolds
Natural and Environmental
Resources Committee
Wyoming Park Bureau

EXECUTIVE SUMMARY

The attached comments note planning gaps (no account taken of likely NLM personnel cuts, land interferences with the Forest Service, nonpublic recreational user fees), and the difficulty of analyzing such voluminous material when few have the time to read it in its entirety. My issues:

1. Limited ownership transfers are endorsed;
2. Disturbed mineral procedures are encouraged;
3. A marginal year to Sweetwater Canyon wilderness, no to the next;
4. What happens to grazing categories I and M should be reconsidered Wyoming Stewardship program encouraged, and "fireman" term dropped or more tightly defined;
5. Forested area on Green Mountain should be turned over to the Forest Service so they can fight the pine bark beetle;
6. Recreation fees should be studied, preferably paid by benefiting counties, in this case Fremont;
7. Some marginal BLM lands should go to the Forest Service and, in the case of small parcels at South Pass and Whiskey Mountain, to the State of Wyoming;
8. District boundaries should be reconsidered for efficiency, perhaps combining the Lander Area with the Big Horn Basin.

Response to Letter 347

1. The Bureau's land use planning process is designated at the RMP tier to identify the appropriate use geographically and the conditions under which these uses would be authorized. It is not designed to consider administrative or budgetary options. Changes in budget can affect the timing of the implementation of some actions. The imposition of user fees would be determined by policy rather than through this RMP.
2. The Forest Service has been consulted and has received copies of the Draft RMP/EIS for review. The parcels identified for disposal in the Whiskey Mountain Management Unit could only be disposed of where the result would be a net benefit to management of the bighorn sheep habitat which could include disposal to the State of Wyoming Game and Fish Department. There were no lands specifically identified for sale or disposal in the South Pass Management Unit. The State of Wyoming presently has land leased from the BLM at historic South Pass City and has applied to patent a portion of these lands under the Recreation and Public Purposes Act. Making land available to the State of Wyoming for such public uses as a State Park is a high priority with the BLM.

1. Planning Gaps. The three-volume RMP/EIS for the Lander Resource Area is voluminous, yet incomplete. Initial study guidelines probably were overtaken by events, as often happens in long-term planning efforts. Specifically:

- + plans and alternatives appear to be set in an economic vacuum, or at minimum, an assumption that RMP funding/staffing would continue into the indefinite future at historic levels. Much more likely will be significant cuts (both real dollars and people) for most functions with the possible exception of minerals.
- + proposed BLM/Forest Service land interchanges are not analyzed, yet these will play an important role in improving the effectiveness of federal land management in the area.
- + the RMP does not not discuss the feasibility of some form of user charges for recreation (hitchhike, timber and grazing users already pay fees), though special recreational use permits are mentioned in BLM 19, col 2; (NOTE: Travel expenditures, B. 176, col 2, adequately discuss three distinct on-adjacent and off-trail.)

Comments below attempt to take into account the planning gaps as well as material omitted in the RMP.

II. Difficulty of Analysis. The voluminous material is hard to handle as an individual, and harder to discuss with others, since few have read the whole report and then studied it in the context of other information on the area. It is understood that some 1500 copies were sent out, yet that most comments have been from out-of-state respondents focusing on wilderness issues to the exclusion of the major issues in the RMP. Public meetings were poorly attended, though RMP staff was well-oriented to answer questions.

III. Comments by Issue. Comments below are divided by issue, including items noted above under Planning Gaps.

1. Ownership Transfers. The RMP identifies isolated tracts of land that could be exchanged or sold to simplify management. This Bureau should be actively pursued, taking into account the advice of the Forest Service in areas where the Forest Service may end up being the administrative agency (see RMP/PS interchange, below). Several small portions of land in the Unkney Mountain wild mountain areas area probably could be usefully transferred to the State of Wyoming for management by Game & Fish. Some land in the South Pass area might usefully be transferred to the State of Wyoming for management by the state - perhaps as a State Park.

2. Minerals. Sharp price declines for Wyoming minerals is likely to cut use of these resources in the immediate future, yet these are a crucial factor in the economy of the region. BLM should look at ways to simplify leasing/mineral/mineralization activities within a framework which could include staff cuts and unstaffing transfers within BLM. A recommendation below under BLM/PS interchange that Game Mountain control be shifted to Forest Service may create some additional mineral confusion in that location. I am not making detailed mineral comments here, hoping that these are coming from present and potential users.

3. Wilderness. There is no clear definition of the added costs incurred when an area is defined as "wilderness," yet there must be incremental costs. On balance a case appears to have been made for making Sweetwater Canyon a wilderness area, though this could be reinforced if a plan were outlined for offsetting added costs with user fees. Agree with elimination of the other areas from consideration as wilderness.

3. Your concern has been noted. The RMP is not designed to consider administrative remedy options. By maintaining public lands open as much as possible to mineral exploration and development, we are following policy intended to make the public lands available for developing strategic and critical mineral resources.
4. BLM does not have any designated wilderness areas in Wyoming, therefore, we have not had any experience with administrative costs. No noticeable change in administrative cost is anticipated as a result of an area being designated as wilderness.
5. The Introduction in the Final Grazing Supplement has been modified to explain this situation.

The three-strand wire fence standard discussed in the Draft Grazing Supplement is for pronghorn antelope ranges where only cattle are authorized to graze. A four-strand wire fence is standard for pronghorn antelope ranges where either cattle or sheep could be authorized to graze. BLM fence standards are tailored to the specific ranges and animals authorized to graze the allotment.

6. BLM supports the State of Wyoming Stewardship program (WSP). Presently, the Sun Land and Cattle operation is being developed under the WSP. This operation involves Maintain (M) and Improve (I) category allotments within the Lander Resource Area (LRA). BLM staff are currently assisting in the stewardship program development for this livestock operation.
7. The most current Bureau of Land Management definition of the word riparian is as follows:

Riparian areas are zones of transition from aquatic to terrestrial ecosystems, whose presence is dependent upon surface and/or subsurface water, and which reveal through their existing or potential soil-vegetation complex the influence of that water. Riparian areas may be associated with features such as lakes; reservoirs; estuaries; potholes; springs; bogs; wet meadows; muskies; and ephemeral, intermittent, or perennial streams.

We agree that the Bureau of Land Management does not grant water rights. The agency that does and regulates the water in the State of Wyoming is the State of Wyoming's State Engineer's Office. Prior to any diversion, storage, or use of the State's surface or underground water, an appropriate State Engineer's permit must first be obtained.

For instance the Bureau must file for water rights with the State Engineer on such things as stock reservoirs and wells.

5 4. Grazing: Historic AUM and fee receipts don't track (e.g., data on p. 29, Col 2, Grazing Supplement). The analysis below skims the numbers, since there are in doubt.

A. Categories I, M and G. A rancher told me how stressed he was to be in Category M, since he wouldn't be bothered by RLM. Yet the definition of categories I and M seem backwards from sound management principles (C is adequate). Suppose a ranch manager analyzes his private property and finds it falls into three categories because of his technique of analysis: the top yielding 10% of acreage, the bottom yielding 10%, and the interim 80%. Under most circumstances he should put available resources first into the top-yielding 10%, because this will have a very fast payoff and in time permit him to put his expanded resources to work on the 80% as well. In contrast, the RMP proposes to take grazing fees from the bulk of leasees and AUM's, who are on M lands, and apply the resources to I lands. These may produce huge percentage improvements (from nothing to a little), yet not as much as moderate improvements to M lands. RMP data support this when it is proposed to reduce AUM's on I lands, hoping to improve them; why not improve M lands first, and increase AUM's on them?

B. Cattle/sheep: The three-strand fence rules may inhibit cattle/sheep range alteration. Is more flexibility possible?

6 C. Industry Realities & Unprecedented Opportunities: Almost regardless of weather, economic forces appear to be driving down animal numbers in the area under consideration, leading to more declared non-use and uncolored underuse. Marginal I lands may not be the first to have reduced herd numbers in cases where a leasee has only I lands, but presumably a user with a reduced herd will be using M lands first. Meanwhile, RLM may be losing

8. Resource specialists in the U.S. Forest Service (USFS), Wyoming Game and Fish Department (WGFD) and within the BLM have been consulted in the preparation of the forestry portion of the Lander RMP.

The pine beetle problem is inherent to all mature and overmature lodgepole and ponderosa pine forests in the west.

In order to alleviate the beetle problem, a market must be found to dispose of the dead and dying timber. Such a market has developed in the Lander area, which is the optimum size to harvest the timber on Green Mountain. The timber on the area cannot be harvested any faster than it is presently being done and is proposed in the plan, or it will have a deleterious effect on the elk herds. The elk herd on the area has increased since logging was started about 15 years ago, and they have maintained themselves very well.

It would be both uneconomical and infeasible from the standpoint of regeneration of the stands, to try to salvage the timber on a strictly selective harvest basis.

9. See Response 1, above.

10. The proposed BLM and Forest Service land interchange is being introduced to Congress as this is written. Some of your suggestions are a part of that proposal regarding transfer of the Lander Slope and general Dubois area BLM-administered lands to the Forest Service.

The proposed interchange is not analyzed in this plan inasmuch as it was initiated after the plan, and is only tentative at this point. However, part of the proposal is that any lands transferred to the Forest Service "would continue to be managed under the land use plan in effect on the date of enactment of the legislation. As plans are revised, they would reflect their new National Forest System status. . . . The transfer of lands would not require the revision of any land use plans."

If the interchange should occur, this plan would apply to any lands transferred to the Forest Service.

11. There are no plans to revise BLM administrative boundaries either as a result of this plan or because of a possible land interchange between the Forest Service and BLM. All of the four BLM Districts in Wyoming have intensive mineral responsibilities as well as all the other resources addressed in this plan. One of the primary reasons for detached resource areas, such as the Lander Resource Area, is to provide decentralized, local public service.

6 Range Management Personnel: A concerted effort should be made by BLM and affected groups like the Corps of Engineers to build up the Wyoming Stewardship Program. When we look at this together, I think we'll see that most of our attention should go to the M lands, even if we want to play around with a few "spectaculars" in the I category.

7 D. Stewardship: This term seems to mean too many different things to too many people - like the Corps of Engineers authority on "navigable streams" which was extended by Congress to include all flowing waters including the ice melt on the fringes of the Teton Peak glaciers. The recently-released RLM definition came after this RMP was completed, and I haven't read it. Meanwhile, the term as used in the RMP seems to be too broad. The crucial factor to me today is mind set:

- The State of Wyoming owns the surface and subsurface water in the state. It is the logical regulator, since it has both ownership and police powers.

- The State of Wyoming owns the fish in the water, and any wildlife using it.

- BLM does not own the water, does not own the wildlife, and only in a few areas is a permit-grantor to private owners of livestock which might use water (Barren area, or is permit-grantor to recreational users, timber users or mineral users who might impact a "priority" area).

8 5. Forest: In the Lander Area, at least, BLM should get out of the forest business, because it is in bad trouble. The chief burden is in the Green Mountain area, with New bark beetle. This area should be turned over to Forest Service expertise so that it can be selectively timbered (including diseased trees) to result in a mixed-age forest. FS will have to work carefully

with the Wyoming Game and Fish, because of the possible timbering effects on the elk herds.

9

6. Recreation: Fremont County Park Bureau has proposed that some sort of "Tourist Near Month" concept be developed for recreational users at a nominal (but psychologically important) rate like \$1 per TUN (30 tourists for 1 day, or 1 for 30). The fee should be paid by the benefitting county, based on estimated use. In the specific case of Fremont County, payments to the Forest Service for Shoshone National Forest use would probably be higher than to RLM. However, once payments of this sort began, they would tend to lead to improved cooperation between the county, cities, the tourist industry, other users like the National Outdoor Leadership School (NOLS), and would undercut the present valid complaint of other fee-paying permittees that they're being forced to cut back their activities (hence losing economic scale) for the benefit of non-paying vacationers. One man's vacation should not destroy another's livelihood in any event, and it is particularly appalling when the vacationer refuses to pay the costs he incurs. If payments by a benefitting county in turn could be collected by the county from leaders in the tourist industry, RLM should not be concerned with running around collecting fees from individual recreational users; this would never be cost-effective.

10

7. RLM/FWS Interchange: As noted above, RLM should transfer the Green Mountain forested area to FS because of the beetle problem. For administrative reasons, the South Park area should go to the State of Wyoming, where appropriate, or to the contiguous Shoshone National Forest. Land in the Red Canyon/Lander (close area west of Route 287) should go to the Forest Service, which can administer from its Lander office. Land northwest of the Wind River Indian Reservation (Tubole area) should go to the Forest

Service for administration, with the exception of small parcels in the Whiskey Mountain area better managed by the Wyoming Game and Fish Department for the wild mountain sheep; these parcels should go to the State of Wyoming.

11

8. District Borders: Do these make sense as administrative units? Suppose some land responsibilities are handed over to the Forest Service; should Lander still report to Sawlins? Or would the minerals importance suggest Casper? Another way to go would be to add together the WY part of Wyoming and the Sawlins portion of the Sawlins District, then combine the Lander Resource Area with the Big Horn basin. The first of these areas would have big oil/gas, big coal, livestock, tourism and I-80, while the Lander/Big Horn combination would have smaller oil/gas, little coal, big livestock and big tourism. Staff allocations might be more efficient. (Park Bureau's districting finds efficiency by combining Fremont County with the Big Horn basin in what we call the Northwest District.)

George A. Newbury
102 Hancock Drive
Lander, Wyoming
February 13, 1986

Mr. Jack Kelly
Lander Area Manager
Bureau of Land Management
P.O. Box 589
Lander, Wyoming

Dear Mr. Kelly:

1 A copy of the Range Management Plan for the Lander Slope has come to our attention. We are disturbed by the classification for potential sale or exchange of parcels 63 and 64 (Map 5-17). This classification of these parcels adversely affects adjacent private land known as Red Canyon Retreat Subdivision, so we urge that parcels 63 and 64 be reclassified as land to remain. We further suggest that in your landowner adjustments you consider the acquisition, in exchange for the release of government parcels in other locations, of parcels to the west of parcel 64 to form a corridor from Red Canyon Retreat Subdivision, through parcel 64 and other parcels to be acquired, to the very foothills of the Wind River Range and to the Shoshone National Forest.

Red Canyon Retreat Subdivision is superbly laid out to take advantage of the natural beauty of the entire area, with special emphasis placed on the enjoyment of adjacent public land (parcels 63 and 64) not even the nearby Red Canyon National Natural Landmark. The Subdivision was planned with not included two road accesses and two equestrian trail segments to the adjoining parcels 63 and 64 for the enjoyment of the subdivision property owners.

We believe that we are typical of those who have acquired lots in Red Canyon Retreat; many of them are out-of-state residents. The natural beauty of the area, protective proximity of the adjoining Federal land, the closeness of the subdivision, the surrounding wildlife habitat, and the dream of a solar home in such a peaceful, scenic area overwhelmed most of us.

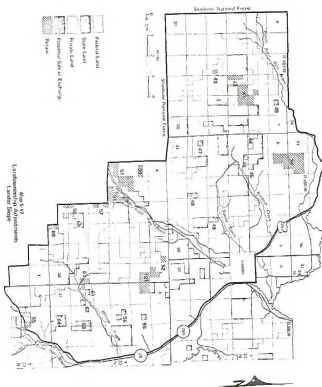
There is always a chance that adjacent private land will be developed, but even in that event the Federal land would be beneficial to such development. Here again the Federal land would attract people, whereas more private land in the form of parcels 63 and/or 64 would in our opinion greatly discourage present as well as future use and enjoyment of the area.

The undersigned are all landowners in the subdivision and/or individuals interested in retaining parcels 63 and 64 as Federal land.

Sincerely yours,

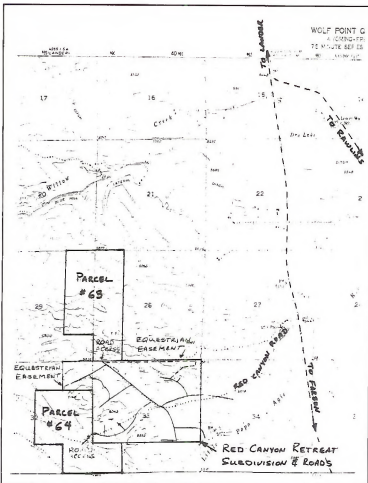
George A. Newbury
David L. Lander
John Campbell
John W. Lander
Tom Christ
Robert Newbury
Carolyn L. Newbury
Dan L. Lander
John A. Lander
Mike

Enclosures: Map 5-17
Map of Red Canyon Retreat
Protective Governance
National Natural Landmark



Response to Letter 350

1. In response to your comment, we will not initiate action for disposing of parcels 63 and 64 at this time, nor will we in the foreseeable future. However, we will keep the option open for disposing these parcels should there be a future opportunity for disposal or exchange that would prove to be in the overall public interest.



ALLAN 11-1-12

DECLARATION OF PROTECTIVE COVENANTS

MYOTAH LAND CO., of Lander, Fremont County, hereinafter referred to as the SUBDIVIDER.

TO THE PUBLIC:

Declaration of Restrictions on RED CANYON RETREAT SUBDIVISION more particularly described on Exhibit "A" attached hereto and by this reference made a part hereof.

PURPOSE:

The SUBDIVIDER desiring to preserve the inherent aesthetic beauty of the real property herein subdivided along with the natural beauty of the surrounding and adjoining real property. And desiring to employ good land use in order to restrict over-development, does hereby make the following declarations as to limitations, restrictions and uses to which the land covered by this declaration may be put, hereby specifying that said declarations shall constitute covenants to run with the land, as provided by law, and shall be binding upon all parties and all persons claiming under them, and for the benefit of and limitations upon all future owners thereof, this declaration of restrictions being created for the purpose of keeping and maintaining the use and development of the land desirable, uniform and suitable in aesthetic and architectural design.

1. SIZE OF TRACTS: No tract shall be subdivided or conveyed in

DEPARTMENT of the INTERIOR

news release

HERITAGE CONSERVATION AND RECREATION SERVICE

For Release November 18, 1980

Steve Siegel 202/343-5726
Jim Orr 202/343-4243

SECRETARY ANDRUS DESIGNATES SIX NEW NATIONAL NATURAL LANDMARKS

Secretary of the Interior Cecil D. Andrus announced today that he has designated six areas in Kansas, Michigan, Texas, Washington and Wyoming as National Natural Landmarks.

National Natural Landmarks are nationally significant examples of America's natural heritage. They are identified through studies conducted by Interior's Heritage Conservation and Recreation Service (HCRS), evaluated by natural scientists, and designated by the Secretary of the Interior if judged nationally significant.

Landmark designation recognizes the significance of a natural area, but it does not affect ownership or tax status of the area. Landmark owners are encouraged to protect the nationally significant values of their property, and are invited to enter into a voluntary agreement with HCRS to protect the area. They are then eligible to receive a certificate and bronze plaque which identify the area as a registered National Natural Landmark.

To date in 1980, 82 areas in 27 states, the Virgin Islands, and Puerto Rico have been designated as National Natural Landmarks as a direct result of the HCRS effort to strengthen and streamline the program. The designations include 71 new landmarks and 3 enlargements of previously designated ones.

The 6 new designations bring the total number of landmarks to 837 listed on the National Registry of Natural Landmarks. The six landmarks are in Kansas, Michigan, Texas, Washington, and Wyoming. Brief descriptions of each follow:

WYOMING

Red Canyon is a 5,760-acre site, 15 miles south of Lander. It consists of gently sloping plains bounded on one side by a steep ridge. The rocks in Red Canyon were deposited over 280 million years ago and along the edges of ancient seas.

Natural Landmark Brief

- 1. Site:** Red Canyon, Fremont County, Wyoming.
- 2. Description:** This 2330 ha (5,760 acres) site, located 24 km (15 miles) south of Lander, represents a dissected escarp. Rocks exposed in the canyon were deposited in and along the margins of ancient seas some 180 to 280 million years ago. The west side of the canyon is formed by the Permian Phosphoria Formation which is a marine deposit composed of dolomite, limestone, sandstone, siltstone, bedded chert and phosphorite. The bedded chert is extremely resistant to erosion and occurs near the top of the formation. Erosion has removed all the nonresistant rock immediately above this chert leaving only the long, smooth dip slopes which form the west side of the canyon.

The bottom of the canyon and the lower 80 m (262 feet) of the east side of the canyon are eroded into the Triassic Chugwater Formation. This unit consists of brick red sandstone, shale and siltstone, and being less resistant, was removed from the underlying Phosphoria chert by erosion. These sediments were probably deposited on the tidal flats, adjacent to the ancient seas during the regressive steps which followed deposition of the underlying Phosphoria Formation. The bright red color of the Chugwater is due to a great amount of oxidized iron hematite and on the grains of the rock and it is this coloration which gives Red Canyon its name.

The Red Canyon rim which forms the east side of the valley is formed by the salmon-colored sandstone of the Cretaceous Huguenot Sandstone. This sandstone was deposited during continued regression of the ancient seas. It represents tidal flat and beach sedimentation as the seas while the upper part displays spectacular cross-stratification which formed during deposition on ancient beach-ridge sand dunes.

As the Wind River Range to the west were uplifted during the Laramide Orogeny some 65 million years ago, this sequence of sedimentary rocks was tilted toward the east. Subsequently, gravels eroded from the range to the west were deposited over these tilted sandstones and can be seen on Table Mountain to the north. However, most of this material was stripped off during the later erosion which unroofed Red Canyon.
- 3. Ownership:** U.S. Government, administered by the Bureau of Land Management; State; and private.
- 4. Significance:** This site is significant for its geologic value as a classic representation in the Wyoming Basin of a hogback and strike-slip valley (quartzite) which exposes an outstanding section of Permian-Triassic red beds, and displays the southeast flank of the Wind River Range structure (developed during the Laramide Orogeny). While not the only such area in the Wyoming Basin, this area has the advantage of being highly scenic and is of such size that it can be viewed and interpreted in its entirety from a single observation point along State Highway 20. There is probably no more classic, well developed or scenic example of oceanic development in the Wyoming Basin Natural Region. Its origin in terms of tilting of sedimentary units and subsequent excavation of less resistant rocks is straight-forward, observable, and easy to understand.

533



TOWN OF DUBOIS

 DIVISION OF REVENUE
 DUBOIS, WYOMING

 Jack Kelly, Area Manager
 Bureau of Land Management
 Lander Resource Area
 P.O. Box 585
 Lander, Wyoming
 82520

Dear Mr. Kelly,

On February 12, 1986 the Dubois Town Council instructed me to comment on the Lander Resource Management Plan D.E.I.S. We are concerned primarily about three areas that we feel could seriously affect Dubois and its surrounding area.

- 1 First, the no surface occupancy for oil and gas leasing in two areas, Whiskey Mountain Sheep winter range and the East Fork elk winter range seen to the town fathers and our constituent population not altogether adequate. Please do not construe this to mean Dubois is against Oil and Gas Leasing, quite the contrary. We support Multiple Use to its fullest extent. We feel these two areas would be better managed for their wildlife potential. Benefits for our community seem to be wildlife rather than oil and gas. These areas are small but can contribute much to preservation of our Sheep and Elk herds and the economic benefits we receive from those resources.
- 2 Secondly, we feel Wyoming has enough wilderness areas. Until the wilderness areas we have are being adequately managed and used we can not support that type of designation.
- 3 Thirdly, we think the B.L.M. should address the Wolf Recovery Plan in Wyoming. We feel the B.L.M. should take an active role in preventing anything like that from happening. Wolves could be detrimental to our big Horn Sheep and Elk calving areas. Critical habitat is hard enough to manage without creating additional threats to a wildlife population.
- 4 One last note, the Warm Springs Tie Back Flume is a significant part of the Dubois heritage. Natural history is part of Dubois and its surrounding area. Dubois would like to see the B.L.M. pursue historic designation and interpretive promotion of some aspect of our Tie Back history.

Thank you for the opportunity to respond to your D.E.I.S. The B.L.M. deserves a vote of confidence for a job well done.

Sincerely,

 DeWayne F. Grubb
 Mayor, Town of Dubois
 Dubois, Wyoming

Response to Letter 533

1. See Response 1 to Letter 15.
2. See general response to wilderness comments.
3. See Response 3 to Letter 96.
4. See Response 7 to Letter 318.

534

B. J. M.

 Glenda Stewart
 Box 203
 Dubois, Wyoming

February 13, 1986

 Legislative Service Office
 State Capitol Building
 Cheyenne, Wyoming 82002

To Whom It May Concern:

Wyoming has never delegated any planning authority - with what happens on our federal lands. Federal agencies react to public pressures from various special interest groups.

I feel the state of Wyoming should plan for use of its federal lands. I feel there should be a Federal Lands Planning Commission Board.

More than 60% of crude oil in Wyoming is produced on public lands. Eighty per cent of the ranches have leases on public lands. Ninety per cent of the timber cut in Wyoming is on public lands, and it is estimated that 95% of the tourists who come to Wyoming, go either to Yellowstone or Teton National Park.

Wyoming needs to put together a planning commission that would oversee what happens on our federal lands, and become involved in the planning process.

Planning for the use of our federal lands is important to Wyoming's economic future. The dismissal of jobs on our public lands in any area, should be only allowed after careful planning.

The federal lands belong to all the people in this country, but it's Wyoming's economy that depends on the federal lands in this state.

We cannot afford to allow federal planners to minimize the importance of multiple use of our state's economy.

The public lands are soon to be used only by the very healthy and wealthy, who can afford these lands as their playgrounds after multiple users are locked out.

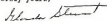
Congressman Cheney has advised the people that a bill may soon be introduced by Congressman Udall in the House of Representatives, which will cripple the gas and oil lease program in the west. Which means less royalty revenues from leasing on federal lands. This will also affect thousands of jobs.

Response to Letter 534

1. Thank you for your comments.

We encourage you for legislation both nationally and locally which will encourage the management of public lands based on multiple use.

Sincerely yours,



cc: John Seiberling, Congressman of Ohio
Frank Duet, Wyoming State Senator
John Vinich, Wyoming State Senator
Bob Weber, Wyoming State Representative
Mary Odde, Wyoming State Representative
Scott Ratliff, Wyoming State Representative
Dennis Tippets, Wyoming State Representative
Harry Tipton, Wyoming State Representative

Don't Kelly
B & M
District Manager
Lander, Wyo. 82540

536



DUBOIS WILDLIFE
ASSOCIATION
BOX 1112 DUBOIS, WY 82513

February 14, 1986

Mr. Jack Kelley, Area Manager
Bureau of Land Management
Lander Resource Area
P.O. Box 389
Lander, Wyoming 82520

Dear Mr. Kelley,

The Dubois Wildlife Association (DWA) offers the following comments on the Lander Resource Management Plan, Draft Environmental Impact Statement. The comments herein will deal with the preferred alternative.

The Dubois Wildlife Association is an affiliate of the Wyoming Wildlife Federation. DWA serves as a source of information and ideas enabling its members and the public to make sound decisions regarding our natural resources. We want development done right-the first time.

ENERGY & MINERALS

1. DWA finds this category to be the most serious limited. The EIS states that the Whiskey Mountain, Dubois Badlands, and East Fork ranges can be protected by the BLM stipulation. Yet in the discussions on Environmental Consequences - Habitat Losses - the EIS states that the most serious habitat losses caused by oil and gas industry have been long-term or permanent. These three areas are some of the finest sheep and elk habitat in the state of Wyoming. These areas are also of low to moderate mineral potential. Weighing the high value of a present natural resource that may be disrupted for an indefinite period of time versus the very also chance of my economic returns is not consistent with sound management practices. DWA requests that the BLM relinquish the Whiskey Mountain, Dubois Badlands, and East Fork Elk Winter Refuge from all energy and mineral exploration.

FISH & WILDLIFE

The fish and wildlife alternative seems incongruous with the energy and minerals alternative. The EIS cannot hope to separate fish and wildlife with exploration in critical habitat areas. DWA asks the BLM to improve habitat in all areas and maximize the wildlife potential of any critical habitat areas for the recreation resources the connectivity resource. As an example, Grazing Allotment #2124 should be examined for possible big game sheep grazing improvements.

LANDOWNERSHIP ADJUSTMENTS

2. The DWA would not like to see any sales of existing public lands in the Dubois area. Instead, the EIS should pursue a trade of public for private land policy. For so cases where a trade cannot be worked out or is not economically feasible,

Response to Letter 536

1. See Response 1 to Letter 15. We have reevaluated Allotment 2124 and believe it should be changed to an I category allotment which will give it higher priority for management attention and range and habitat improvements. Consultation with the operator concerning the category change will be initiated.
2. Exchanges are usually our first preference in disposing of land when public lands can be consolidated or conflicts can be resolved, but exchange is not always appropriate or feasible for a variety of reasons. All disposals are subject to environmental assessment which will entail a site specific analysis of impacts on all resources including wildlife habitat and recreation opportunity. Disposal of the tracts in the East Fork Management Unit would be limited to exchanges or sales to wildlife management agencies or organizations which would continue to manage the area as a big game winter range.
3. The RMP calls for managing ORV use. Specifically, the Preferred Alternative proposes to close Dubois Badlands to ORV use and limit the Whiskey Mountain Big Game



DUBOIS WILDLIFE ASSOCIATION

BOX 1112 DUBOIS, WY 82513

PAGE 2

and after thorough public review and a determination that wildlife or recreation will be sacrificed would DWA sue need of a sale. In areas of critical habitat, such as in East Fork Elk Winter Refuge, any transfer of sales should be for habitat use only.

RECREATION MANAGEMENT & OFF-ROAD VEHICLE USE

3. The BLM's recreation management in the Dubois area has been less than good. The transportation system is the big weakness. With the lack of policing, the area is experiencing excessive erosion due to O-R-V use on non-open roads. Also, motorcycle use in the Dubois Badlands is causing damage to the fragile hills and harassing the wildlife of the area. These above problems are also causing problems between landowners and sportsmen. DWA has no problem with the existing roads as we want to see the public lands utilized and enjoyed. DWA would like to see definitive action on non-open roads, i.e., a policing policy and road closures. Also, the DWA requests the BLM to investigate the damage being done in the Dubois Badlands on non-designated roads.

FIRE MANAGEMENT

The BLM takes a neutral position of a management tool that, by their own admission, can be a beneficial tool. They cite the best case-worst case scenarios, and also state that they have not fully explained the potential for the Land Resource Area. The DWA believes that the BLM should use what tools are available, including fire management, for the betterment of wildlife habitat.

ACCESS

4. DWA does not see access as a problem in the Dubois area. There are isolated cases where BLM access is denied when the BLM is surrounded by private property. As a whole, BLM access in the Dubois area is good. The BLM's concern over considering access into the Tappan Creek area may not be in the best interests of wildlife as Tappan Creek is on the eastern edge of an elk migration route. Unlimited access could cause too much pressure on the elk and affect their migration away from their winter grounds.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

5. Whiskey Mountain.
With the largest Rocky Mountain Bighorn Sheep herd in the United States in this area, it should be managed with the sheep a top priority. All other resource development would be down only if they do not jeopardize sheep habitat management. Whiskey Mountain, including the Red Creek and Little Red Creek drainages on Arrow Mountain should be managed under AGSC status for Bighorn Sheep habitat.

Dubois Badlands.

Not only an area with outstanding scenery that has been much photographed, but



DUBOIS WILDLIFE ASSOCIATION

BOX 1112 DUBOIS, WY 82513

PAGE 3

also important habitat for Rocky Mountain Bighorn Sheep and Mule Deer. This area is extremely fragile from a soils point of discussion and needs protection from commodity development. DWA believes that the Dubois badlands should be managed under AGSC status or as an Outstanding Natural Area Designation. This would allow for future wildlife habitat development.

GRAZING

Grazing is another problem that is being talked about with no one in the BLM wants to implement a plan after the plan has been put forth. The BLM has made mention of areas that are classified as fair to poor vegetation conditions. The BLM has also made definite decisions of what needs to be done in these areas. As the lands of the public have been entrusted to the BLM for proper management, why must we have an EIS on grazing before any action is implemented. The action should have been started some time ago with periodic planning updates as the need arises for each case. The blame for overgrazing or improper grazing should not be put on the shoulders of the permittee, but on the permittee and the managing agency. DWA believes in Wyoming's superb wildlife and habitat, precious water resources, rich farmlands and rangelands and the importance of agriculture to the state's heritage and economy. DWA also believes that grazing should not compromise our fish and wildlife and recreation resources. DWA requests the BLM to manage our rangeland and water resources so as to be compatible with all wildlife endeavors—starting now, not after an EIS study. We also want the BLM to manage grazing in a manner that will not pit residents against wildlife.

Respectfully,

James L. Rose
James L. Rose, President

Winter Range to designated roads and vehicle routes. Problem roads would be closed and seasonal closures would be made on other roads for protection of wildlife and watershed resources. The remaining areas in the Dubois Management Unit would be limited to existing roads and vehicle routes.

4. The Preferred Alternative provides for the use of fire management actions like prescribed burns for enhancement of wildlife habitat.
5. See Response 8 to Letter 318.
6. See Response 1 to Letter 15.



Wyoming Wildlife Federation
P.O. Box 105, Cheyenne, WY 82003
307-637-5433

February 14, 1986

Mr. Josh Kelly, Area Manager
Bureau of Land Management
Lander Resource Area
P.O. Box 388
Lander, Wyoming 82520

Dear Mr. Kelly:

The Wyoming Wildlife Federation is Wyoming's oldest and largest organization of sportsmen and outdoor club. Our membership, presently over 9,000 strong, is composed of men and women from business, manufacturing, construction, educational, professional, avian, and agricultural backgrounds. We are a broad-based, mainstream group of Wyoming citizens endorsing both conservative use of and conservation of our natural resources. Our unifying concern is for the preservation of the special sporting way of life which is based upon hunting, fishing, and other outdoor recreational activities. This way of life is closely dependent on the continuing conservation of Wyoming's superb wildlife and wildlife habitat.

Please consider these comments on the Lander Resource Management Plan DEIS, which were written by Peggy Peterson, Chris Peterson, and Terry Taylor, as constructive suggestions and criticisms designed to promote multiple use management of the public lands under your charge. In addition, we endorse the comments submitted appropriately by the National Wildlife Federation.

Sincerely,

Chris H. Peterson

Chris H. Peterson
Vice-President of Conservation

Enclosure

cc: Senator Alan Simpson
Senator Melvin M. Wallop
Representative Richard K. Cheney
Representative Jim Scherfing
National Wildlife Federation
Wyoming Game and Fish Department

WORKING TODAY FOR WILDLIFE'S TOMORROW
Wyoming Affiliate of the National Wildlife Federation

Wyoming Wildlife Federation
Lander RMP DEIS Comments
Page 1

ENERGY AND MINERALS

We believe one of the major deficiencies of the Draft RMP is the emphasis of oil and gas leasing and exploration at the expense of other public land resources and users.

"The overall theme for management of the oil and gas resources within the resource area is to make public lands available for leasing to the maximum extent possible, while giving due consideration to the protection of other significant resource values." (p. 289)

"All but approximately 13,000 acres of the open strata would be managed under a management prescription that would allow for enhanced management of the oil and gas resources by being less restrictive of oil and gas development related to other surface resource values in areas rated as having a high potential for the occurrence of oil and gas." (p. 289-290)

Statements such as "due consideration of other significant resource values" and "less restrictive of oil and gas development" fall seriously short of the BLM's multiple use management responsibility.

1 The cumulative impacts from non-renewable resource exploitation and extraction should be carefully evaluated and appropriate mitigation measures must be implemented to avoid adverse impacts to wildlife and other resource values. A discussion on page 190 states, "If current or increased levels of industrial activity continued for another 10-60 years, in high-value habitat sites or important seasonal ranges, significant negative impacts to fish and wildlife populations would occur." The discussion continues, "...approximately 60,000 acres of land no longer provides habitat capable of supporting fish and wildlife populations at pre-development levels." This suggests past BLM management policies have allowed resource extraction to jeopardize wildlife.

Response to Letter 537

1. See Response 1 to Letter 15 and Response 3 to Letter 12. The request to which the Solicitor was responding involved an existing lease which did not contain a no-surface-occupancy restriction at the time it was issued. The Solicitor's opinion advised that we cannot unilaterally impose a no-surface-occupancy stipulation on an existing oil and gas lease that was not conditioned with that restriction at the time the lease was issued. The reference you noted as to the possibility that the BLM could not enforce a no-surface-occupancy restriction cited a case that was subsequently overruled by the Tenth Circuit. Current case law confirms that a lease conditioned with a no-surface-occupancy stipulation at the time of lease issuance and accepted by the lessee subject to that restriction, would be enforceable. *Sierra Club v. Peterson*, 717 F.2d 1409 (D.C. Cir. 1983).
2. The 40 percent cover to 60 percent forage area ratio is a definite goal in all BLM-administered timber areas in the Lander Resource Area. This statement was inadvertently left out of the Green Mountain write up and has now been added to the Final EIS.

3. This inadvertent mistake has been corrected in the Final EIS, to read "for the next 10 years."

The inventory was set up to delineate sawtimber stands and pole stands on the basis of volume per acre. Any stand showing a volume below a certain point would show up as a pole stand. The timber stands on Green Mountain are variable and due to the beetle epidemic and mistletoe infestation, there were many dead trees of sawtimber size in the samples taken, which were not counted. Many broken down sawtimber stands show up on the inventory as pole stands, and the dead volume did not show up. Our present markets utilize predominantly dead wood, so those stands that showed up as pole stands are now being utilized for sawlog production. This will increase the volume available, but it is not known by how much.

4. Timber sales on Green Mountain are not designated to accommodate any specific purchaser. They are designed to achieve management objectives involving the maintenance or enhancement of wildlife habitat and future timber growth. Louisiana Pacific Corporation has not bid on any sales on Green Mountain for the last 5 to 6 years, since the beetle epidemic started. The stands contain too high a percentage of dead trees to allow them to compete on an economical basis.

1

Unrestricted mineral, and oil and gas activities will cause long-term impacts to fish and wildlife over the next 80 years as the Draft RMP acknowledges on pages 226-230. Seasonal restrictions can be effective in some areas while other areas warrant withdrawal from leasing for protection of important resource values such as wildlife and recreation.

Seasonal restrictions should be coordinated with the Wyoming Game and Fish Department to avoid conflicts with wildlife in areas of crucial habitat, and with peak recreational use. Crucial wildlife habitat constitutes a relatively small portion of public lands, and therefore, seasonal restrictions in these areas will not significantly affect exploration activities. Further, seismic exploration has often coincided with opening dates or weekends during big game hunting seasons on Green Mountain according to Wyoming Game and Fish Department comments. Adverse impacts on hunting quality and potential physical injury to either hunters or seismic crews could be avoided with very limited seasonal restrictions on seismic activity.

Better planning by exploration companies will avoid delays and excessive costs that have sometimes been attributed to seasonal use restrictions. Such restrictions must be adhered to and enforced to avoid serious damage to the wildlife resources, and to maintain RMP credibility with other public land users. Modification of these seasonal use restrictions can be considered if and when development drilling takes place. As we are all aware, successful exploration discoveries leading to development are the exception rather than the rule.

We are not convinced NSD restrictions alone will guarantee protection to important fish and wildlife resources. In a memorandum dated October 10, 1980, the Acting Regional Solicitor

1

of the Interior Department for the Rocky Mountain Region concluded that the Secretary of Interior, "cannot use...[a no surface occupancy] stipulation as an instrument to violate the [available] right to drill given the lessee by the Mineral Leasing Act." Thus, the Interior Department itself has taken the position that once a lease has been issued, the lessee cannot be precluded by means of protective stipulations from exploring for and developing oil and gas reserves. This legal opinion by the Interior Department clearly indicates that the BLM has no legal basis to enforce NSD restrictions. Further, because NSD restrictions can be waived or altered by the BLM at any time without public participation or review, we do not believe an NSD restriction guarantees protection to other important public land resources such as wildlife.

Therefore, we request that crucial wildlife habitats identified by the Wyoming Game and Fish Department in the Lander Slope, Red Canyon, East Fork, and Whiskey Mountain Management units be withdrawn from mineral location and oil and gas leasing.

According to the Wyoming Game and Fish Department comments on the Draft RMP, BLM State Directors have already signed documents and cooperative agreements stating that there should be no oil and gas leasing on the Red Canyon, East Fork big game winter ranges and the Whiskey Mountain big game sheep winter range. We insist that the BLM honor the commitments it made in cooperative agreements and memorandums of understanding with the Wyoming Game and Fish Department, the United States Forest Service, and the United States Fish and Wildlife Service.

5. See Response 4 to Letter 294.

In the rest of the resource area, the main reason that some areas were recommended for full suppression was the intermingled landownership patterns and the amount of man-made developments. The BLM is responsible for protecting other lands and developments from damages from fire starting on BLM-administered lands.

6. Timber management plans are not necessarily designed to accommodate timber demand. With the present market for timber in this area, it would make no difference at all whether the timber was salvaged as it is now or if it was salvaged after it was burned. Fires in lodgepole pine mainly burn the bark off trees, leaving the inner wood undamaged, so the timber could be burned and stand for several years and still be harvestable for houselogs or firewood. If prescribed burns were initiated over the entire mountain as quickly as possible, it would jeopardize big-game herds by eliminating too much thermal and hiding cover too quickly.

The compartment plan for Green Mountain assumes that work may be undertaken in several compartments during any 5 to 6 year working period. This should achieve the goal of retaining the right amounts of cover and forage and eventually creating an uneven-aged forest over the entire area.

7. BLM negotiated with the State Land Commission for access in the Hadsell Ranch area in 1983 and our application was rejected. This RMP recommends alternative access via Cooper Creek from the north to tie into the Green Mountain Loop Road.

8. As part of the Off-Road Vehicle plan implementation and management, the BLM does post an area or roads with permanent signs indicating the dates of seasonal closures.

9. Legal public access across state land for recreation was one of the many considerations used to evaluate each of the isolated parcels for potential disposal or retention. Many of the parcels that were recommended for retention had high recreational value and there was access to these parcels across state land. In some cases, there was access but little or no recreational opportunity or any other significant resource value. These lands were recommended for potential disposal.

10. This information is in our office and available for anyone to review.

11. In regard to potential land disposal, this plan, which is intended to guide land management decision for the next 10 years, allows the opportunity for the identified parcels to be disposed of. Any proposals would be subject to site specific environmental assessments

FOREST MANAGEMENT

Timbering

- 2 The Wyoming Wildlife Federation recommends all timber management plans for the resource area include attempts to maintain a ratio of 40% cover to 60% forage and that the cumulative impacts from the development of oil and gas, uranium, or other locatable minerals be mitigated. A strict definition of what constituents cover needs to be established based on Wyoming Game and Fish Department standards.

- 3 The Green Mountain Management unit has a present forest inventory volume of 36 MMBF (Table 3-17 p. 120). A discussion on page 121 states, "The cat on the mountain could easily be accelerated for the next 10 to 20 years from the 1 MMBF to the 2.2 MMBF proposed to meet the demand." If an annual 3.3 MMBF were added cut for 20 years the total would exceed the present inventoried volume of timber by 8 MMBF. Based on these figures we question the validity of RLM's claim that 2.2 MMBF could be cut annually.

- 4 The Wyoming Wildlife Federation supports forest management to reduce beetle kill and cut to salvage beetle-killed timber. At the present time the mountain pine beetle infestation on Green Mountain is reported to have killed approximately 80 to 90 percent of the trees 8 inches in diameter and larger (p. 123). Therefore, we are concerned that any sawtimber sales designed primarily to provide live trees to Louisiana Pacific mills would deplete the small amount of remaining live, mature forest left on Green Mountain. Since Louisiana Pacific does not take dead timber, we do not believe their operations would be beneficial to forest management on Green Mountain.

Fire Management

- 5 The Draft RMP recognizes that natural and man-caused fire can be a useful management tool (p. 130, 136, and 202). Yet, the Draft RMP proposes full fire suppression in many areas such as Windy Mountain where burning would be beneficial. The WVF supports the use of natural and prescribed burns to effectively and economically benefit forests and wildlife (p. 130, 131).

Under the proposed management prescription prescribed burns will be allowed in some management units to benefit wildlife habitat and natural resources. Yet, in the South Pass, East Fork, Whiskey Mountain and the Dubois Management units, the preferred alternative is full fire suppression with no equipment restrictions. This seems very inconsistent since natural fires could often be confined and temperatures controlled by limited fire suppression. Potential problems in areas of mixed land ownership could be resolved by entering into prior fire management agreements with all parties involved.

- 6 Wildlife habitat could be improved in the Green Mountain Management unit with prescribed burns. The preferred alternative for forest management in the Green Mountain Management unit status, "...prescribed burns or other techniques would be applied to areas within each compartment, either at the same time sales were being conducted or immediately after sales have been terminated. The Plan is to complete all management actions in every compartment within 110 years." (p. 308) It is unreasonable to delay scattered prescribed burns on Green Mountain because beetle infestation has already created an emergency situation. Delaying prescribed burns to accommodate the demand for forest products is not good forest management.

which would consider the relative value of crucial wildlife habitat as well as all other resource values. A decision to dispose of a parcel, based on the environmental assessment, is subject to review and comment by all interested parties.

12. General management objectives for Category I allotments were established for this RMP and are listed in the Final Grazing Supplement. The management objectives for each Category I allotment listed in Table B-2 are to correct the existing problems/resource conflicts indicated by the categorization factors listed.

Following completion of the RMP, the Lander Resource Area will prepare and distribute for public information a summary document called the Rangeland Program Summary (RPS). The RPS is principally a communication tool which is used to: 1) announce to the public the results of the livestock grazing portion of the land-use plan/environmental analysis; 2) inform the public of the Bureau's rangeland resource management objectives for the allotment or planning area; and 3) document publicly the actions intended to achieve those objectives. The RPS is a communications bridge between the two major decision points affecting livestock grazing, determination of the land-use planning decisions, and determination of mutual agreements or grazing decisions to be issued to individual grazing permittees and lessees. As such, the RPS provides a tracking mechanism from the analysis in the land-use plan and associated environmental analysis, through subsequent decisions, to the implementation of grazing management actions. The RPS assists those interested in following the decision process by: 1) focusing attention on the actions needed to achieve rangeland resource management objectives; and 2) facilitating consultation on developing allotment-specific grazing management decisions or agreements.

The RPS will be sent to the Wyoming Wildlife Federation and the Game and Fish Department, as well as any others that the Lander Area Manager determines should be informed. It will lay out a timetable for consultation. Consultation and coordination following distribution of the RPS focuses on those allotment-specific actions required to implement land-use planning decisions and addresses such issues as the timing, manner, and magnitude of any livestock use adjustments; formulation of actions needed to respond to resource management objectives or constraints; development of needed grazing management practices; opportunities for range improvements, including the feasibility of cooperative development and

ACCESS

The Wyoming Wildlife Federation (WWF) endorses the proposed easement acquisitions listed in Table 5-2 (p. 301). We also agree with the Wyoming Game and Fish Department on the need to acquire access into the Red Creek portion of Whiskey Mountain to properly manage wildlife.

Primitive road access easements across private lands surrounding the Sweetwater Rocks area need to be negotiated by BLM to provide public access to these large blocks of nearly isolated public lands. However, primitive road access should stop at trail heads at the edge of these wilderness study areas once private lands are crossed. Such public access will be necessary to manage reintroduced bighorn sheep populations once they become established.

7 | We recommend the BLM negotiate additional primitive road public access along the two existing Huddell Ranch roads that cross Crooks Creek, and traverse state and private lands in Sections 22, 27, 28, and 29 T27N, R90W, to connect to the Willow Creek Road.

Additionally, the BLM should implement a public survey program including public hearings to identify areas where additional access is needed. This should be a joint program with the Wyoming Game and Fish Department. The WWF would be very interested in helping to initiate this type of program.

OFF-ROAD VEHICLE DESIGNATIONS

Closed to Vehicle Travel

We support the preferred alternative to close the entire Dubois Badlands and Castle Gardens Management units to vehicle travel. A closure of the Dubois Badlands is desperately needed in order to protect the fragile soils, scenery, and wildlife. Erosion has been a historic problem in this area and unstable soils are extremely susceptible to wind and water erosion. Wildlife has also been displaced because of vehicular travel and noise.

Vehicle Travel Limited to Designated Roads and Vehicle Routes

We are pleased the BLM recognizes that "picking up big game kills" (p. 298) is a necessary task and has excluded it from this designation.

Seasonal Closures

8 | The WWF supports seasonal closures of roads to protect wildlife. We believe public hearings on proposed road closures should be held. It would also be beneficial to the public if permanent signs with the dates of seasonal closures were posted at the beginning of the roads.

Landownership Adjustments

The WWF believes the federal government should retain ownership of public lands that 1) are accessed by a public

maintenance; opportunities for range improvements, including the feasibility of cooperative development and maintenance; opportunities available for developing cooperative management plans to include grazing use on lands administered by other agencies or lands controlled by the permittee or lessee; and a monitoring program which will evaluate progress in achieving the resource management objectives.

Consultation will occur with Wyoming Wildlife Federation representative(s) during the establishment of specific management objectives and the monitoring program for I category allotments.

13. See Response 3 to Letter 294. The purpose of considering Alternative C was to determine if rangeland problems could be solved by just reducing livestock use. Alternative A proposes to reduce livestock grazing 13-19 percent in Improve category allotments.

14. Crooks Creek is approximately 30 miles long. It runs from the divide between Green Mountain and Whiskey Peak south and west to Crooks Gap. It then turns north through Crooks Gap and ends near the Sweetwater River northeast of Jeffrey City. Of the total estimated 30 miles, about 1 1/2 miles are on public land. The remaining 28 1/2 miles are on private or state lands. Crooks Creek runs through eight different grazing allotments. Seven of these are individual grazing allotments. Six of these seven allotments contain less than 20 percent public land. The Green Mountain Common Allotment contains approximately 7 miles of Crooks Creek of which 1 1/2 miles are public land. The authorized livestock grazing use levels since 1980 have not increased significantly. The total active licensed AUMs was lowest in 1985 with 34 percent of the total grazing preference activated and highest in 1982 at 60 percent active.

BLM encourages livestock permittees not to place salt blocks immediately adjacent to or within riparian areas. However, BLM does not have statutory authority to regulate this practice on private or state lands.

15. See Response 3 to Letter 294. Riparian area conditions will be inventoried prior to and during the activity planning process. Allotment management plans (AMPs) and habitat management plans (HMPs) for wildlife will be developed after the RMP and Record of Decision are final. These activity plans will be prepared for specific allotments or areas, will be based on current resource inventory information, will implement an intensive monitoring program, and will be developed with consultation, coordination, and cooper-

right-of-way, 2) adjoin state or other federal lands to block-up BLM lands, or 3) have significant wildlife or cultural/historic values.

9 Long standing State Land Commission policy allows hunting and fishing foot access on and across state land. It is about time the BLM recognized this state policy as legal public access. Any land disposals that are based on the lack of recognition of this policy will be opposed by the WWF. The BLM should reevaluate the proposed land disposals keeping in mind that the public does have legal foot access across state lands to BLM lands.

10 The Draft BNP should have shown legal access roads on the (uncoverably) argument maps so the public could evaluate the proposed sales as to accessibility. Why was this not done?

11 The WWF strongly opposes any land sales or exchanges which would take crucial wildlife habitat out of public land ownership. There is no basis for the BLM claim that there is little potential for an adverse land use change if they were sold or exchanged. The BLM has no idea of what use the land will be put to 25, 50, or 100 years from now. We will work to defeat any attempts to remove crucial wildlife habitat areas from public ownership.

Any future proposals for disposal or exchange should be in the form of a planning amendment complete with public hearings.

Green Mountain - Map 5-12 (p. 311)

Tract 134 This tract of land is accessed by the Green Mountain Loop Road and should not be disposed of.

Beaver Creek - Map 5-15 (p. 316)

Tracts 86, 80, and 81 These tracts appear to be accessed by Hwy. 287. If so, they should not be disposed of.

Lander Slope - Map 5-17 (p. 323)

Tract 44 Tract 44 is crucial elk and mule deer range and should not be disposed of.

Tracts 59, 63, and 64 Tracts 63 and 64 are crucial mule deer range and tract 59 is crucial elk range. These tracts should not be disposed of.

Gap Hills - Map 5-24 (p. 338)

Tract 137 and 138 These tracts adjoin state land which joins BLM in the Beaver Creek Management unit. These tracts should not be disposed of.

Tracts 158 and 159 These tracts are accessed by County Road 322 and should not be disposed of.

Tract 150 This tract abuts Pathfinder National Wildlife Refuge, has public access, and should not be disposed of.

East Fork - Map 5-28 (p. 345)

Tracts 24, 25, 26, and 27 These tracts of land should not be disposed of. These lands are crucial elk winter range and should not be removed from public ownership.

Debris Redlands - Map 5-31 (p. 349)

Tract 35 If the state land which abuts tract 35 has legal access this tract should not be disposed of.

Debris - Map 5-37 (p. 359)

Tracts 17, 22, and 23 These tracts abut state lands which have access and they should not be disposed of.

ation with the affected parties. These activity plans will be developed on the high priority I category allotments first, as funding allows.

16. The reintroduction of bighorn sheep is addressed in the Preferred Alternative.

GRADING

12

There are 38 Category 1 allotments in the Lander Resource Area. They comprise 42% of the acreage in the study area and are characterized by poor range conditions. The Draft RMP should have laid out a specific plan and time table to improve these range conditions.

"All management actions for the allotment would be implemented after consultation with the affected parties. After establishing objectives, a monitoring program would be developed to evaluate the effectiveness of the present management situation in achieving those objectives. Objectives would be developed to ensure protection to waterfowl, quail, wildlife habitat, and vegetation. If the objectives were not being achieved, allotment management plans (AMPs) would be developed and would incorporate any or all of the following specific management actions," (p. 11, Grazing Supplement)

Why didn't the BLM establish management objectives for Category 1 allotments during this current planning process? When will the "consultation with the affected parties" take place? The WWF considers its membership to be an "affected party" because of our utilization of wildlife and aesthetic resources which are dependent on good range conditions. Therefore, the WWF wishes to be included in the future consultations. If the BLM does not believe the WWF should be a part of this consultation, please contact us with your list of reasons why not.

The BLM should consult with its wildlife biologists and the Wyoming Game and Fish Department prior to any: 1) vegetative manipulation, such as vernal pool spraying or burning, 2) new fencing, 3) introduction of livestock into new areas, or 4) seasonal use changes.

RIPIARIAN AREAS

13

The Draft RMP fails to adequately address the seriousness of the poor riparian conditions in the resource area. Riparian areas are very important habitat for a wide variety of wildlife. Because so much of the resource area is in arid to semi-arid regions it is very important that riparian areas be managed to maximum potential.

"Continual grazing during the same season year after year has caused wetland and riparian habitat within many of these allotments to fall below their potential to support a more abundant and diverse wildlife community. These areas would remain below their potential until adequate measures (intensive grazing systems, better water distribution, etc.) were taken to alleviate the problem." (p. 37, Grazing Supplement)

The Draft RMP plays down the usefulness of the reduced livestock grazing Alternative C, by claiming that it would not substantially improve riparian areas.

"The number of livestock in the overgrazed areas would be reduced, but the livestock that remained would still concentrate in low-lands, riparian areas, and around water." (p. 45, Grazing Supplement)

This statement flows in the face of logic. If you are overgrazing rangeland including riparian areas then you must decrease the number of AUM's. After AUM's are decreased then excessive concentrations of grazing along riparian habitat can be controlled by placement of salt licks, fencing, and limitations on the length of time livestock are allowed in the allotment.

- 13) We suggest the inadequateness of the so-called reduced livestock grazing Alternative C are a matter of design not concept. The BLM must offer an effective reduced livestock grazing alternative in its RMP to meet NEPA requirements.
- 14) Some of our members have personally noted a continuing decrease in riparian habitat quality along Crooks Creek (Green Mountain Management unit) during the last 8 years. They have even seen an almost yearly increase in the number of cattle grazing along Crooks Creek in the late summer. An increase in the number of salt licks placed next to the drainage has also been noted. As a result, stream bank vegetation has been excessively grazed and trampled, and sage grouse populations have declined in this legendary grouse hunting area.
- 15) The WWF urges the BLM to: 1) inventory the condition of all riparian areas within the Lander Resource Area, 2) develop a plan to restore, improve, or maintain appropriate riparian areas, and 3) implement a riparian area monitoring program. Funding to correct the problem must come from the source of the problem, livestock grazing.

REINTRODUCTION OF BIGHORN SHEEP

- 16) The reintroduction of bighorn sheep into the Sweetwater Rocks area should be listed under the current management alternative because BLM managers have already agreed to the Wyoming Game and Fish Department's plans to reintroduce bighorn sheep.
- The reintroduction of bighorn sheep into the Sweetwater Rocks area should be specifically included in the preferred alternatives in each of the areas involved.

The WWF sincerely believes that the BLM should play an active role in promoting the program for reintroduction of bighorn sheep in the Sweetwater Rocks area. If the BLM needs evidence of popular support for the reintroduction of bighorn sheep, then the WWF would be happy to assist in documenting this support. This program is very important to the WWF membership.

CONCLUSION

The Draft RMP is seriously deficient in planning for: 1) wildlife, 2) recreational activities, 3) oil and gas impacts, 4) timber management, 5) choice of land disposals, and 6) mitigation of overgrazing in riparian areas. Please consider rewriting the Draft RMP, or make major revisions in the Final RMP.



February 13, 1986

Mr. Jack Kelly
Lander Resource Area Manager
P.O. Box 589
Lander, WY 82520

Dear Mr. Kelly:

Enclosed are the comments of the National Wildlife Federation on the draft Lander Resource Management Plan/EIS. The National Wildlife Federation is the nation's largest conservation/education organization, with 4.5 million members and supporters in 51 states and territories, including the State of Wyoming. In addition to offering these comments, we incorporate by reference the comments submitted by our state affiliate organization, the Wyoming Wildlife Federation.

Sincerely,

David Alberwerth
David Alberwerth
Legislative Representative

enclosure

Response to Letter 538

1. The withdrawal review procedures were followed, in the Lander Resource Area, for revoking the Classification and Multiple-Use (C and MU) Act Classification W-6228. It was considered in the planning process as part of the Sweetwater Management Framework Plan which was prepared in 1979-80. That planning recommendation was followed by an environmental assessment in 1982 which considered the site-specific impacts of opening lands in the Green Mountain and South Pass units. The decision following the environmental assessment, which included consultation with the Wyoming Game and Fish Department, was to cancel the segregations from appropriation under the general mining laws on some of the lands (approximately 4,500 acres) under review. The segregations were continued on the rest of the lands (approximately 1,900 acres) because of important wildlife and other resource values which could be adversely impacted by an opening to mineral location. The Final EIS has been noted to reflect the status of the lands during the pendency of Judge Pratt's preliminary injunction issued February 10, 1986. It is noted that an appeal of said decision is pending.

Alternative B in the Draft RMP/EIS also considers continued segregation of previously segregated lands in the South Pass Management Unit and the Final EIS incorporates such an alternative for the Green Mountain Management Unit. The Preferred Alternative would retain the mineral segregation on just those lands where wildlife and other resources could be significantly impacted by locatable mineral exploration and development. In addition, the lands that would remain open to mineral entry in the Preferred Alternative would contain protective measures including the requirement for a plan of operations for mineral location and development in the Green Mountain and South Pass Management Units. Protective measures for oil and gas development are listed in Appendix 2 of the Resource Management Plan.

2. The Preferred Alternative strikes a balance between oil and gas development and other multiple-use values.

Our approach in this plan was to first identify important resource values such as critical wildlife habitats and areas with high potential for oil and gas. We then used this information to select a management prescription that would provide for both oil and gas development and management and protection of wildlife resources. This included protective



NATIONAL WILDLIFE FEDERATION

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COMMENTS OF THE
NATIONAL WILDLIFE FEDERATION
ON THE
DRAFT LANDER RESOURCE MANAGEMENT PLAN/EIS

Submitted by

Karl Gavelle, Acting Director
David Alberwerth, Legislative Representative
Kathleen C. Zimmerman, Counsel
Kathleen Pascoe, Conservation Intern

Public Lands and Energy Division
Resources Conservation Department

February 13, 1986

INTRODUCTION

The primary interests of the National Wildlife Federation in the proposed Lander Resource Management Plan relate to the impacts on wildlife of the following six basic issue areas: withdrawal review, oil and gas leasing and development, locatable minerals management, Areas of Critical Environmental Concern, livestock grazing, and management of riparian areas. We will examine each of these issue areas in turn.

WITHDRAWAL REVIEW

- 1 The draft simply fails to acknowledge the existence of the Bureau's withdrawal review program or the fact that thousands of acres within the planning area which were previously closed to mineral development have recently been opened, illegally, as a result of that program.

Under Section 20(d) of the Federal Land Policy and Management Act, 43 U.S.C. §1712(d)(1982), all decisions concerning prior classifications must be reviewed in the course of developing resource management plans, and can be terminated or modified only if they are consistent with land use planning authorized under the Act. The Bureau violated this provision of FLPMA when it terminated the segregative effect of the Classification and Multiple Use Act classifications in the South Pass and Green Mountain management units prior to preparation of the Lander Resource Management Plan. Its continued failure to analyze the impact of opening those lands in the present land use planning process merely compounds that violation. Apparently, the Bureau intends never to review these classification decisions in conjunction with the preparation of this or any other plan or plan amendment in the Lander Resource Area, nor will they ever be subject to adequate environmental impact analysis or public input.

The consequences of the Bureau's illegal actions in improperly terminating these classifications has dire implications for wildlife, as the BLM plan demonstrates. For example, on May 10, 1984, the BLM terminated the segregative

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1 Classification on 4,455 acres in the South Pass-Green Mountain region. Since the removal of the mining segregation, over 300 claims have been staked in Green Mountain and South Pass Management Units. The draft RMP now acknowledges that:

[I]n the Green Mountain Management Unit, uranium exploration and development might cause significant losses of crucial winter and winter/early spring and mudoler terrores and in trout habitat in the Willow Creek and Cottonwood Creek drainages over the 100g term. Elk and trout populations may be lost entirely. (p. 328.)

In South Pass:

[O]perations on lode and placer mining claims cause loss of trout fisheries, beaver habitat, and crucial winter and winter/early spring habitat associated with riparian zones. Many other wildlife species have been affected where the high or moderate-priority staked habitat sites have been lost.... If gold mining activities continue to erode those high-value habitats, trout fisheries, the Lander beaver herd, the beaver pond ecosystems, and the populations of many other wildlife species would suffer significant negative impacts. (p. 329.)

Despite these stated concerns, no proposed alternative in the draft recommends reinstituting the prior mineral segregations on these lands.

Given these facts, we recommend that the Bureau reconsider its decision to terminate these classifications and provide the public an opportunity to comment on the proposed terminations within the context of the development of the Lander RMP. In addition, the Bureau must comply with the Order entered by the Federal District Court for the District of Columbia on February 10, 1986 in CA No. 85-2238 as follows: The Bureau may take no action inconsistent with the specific restrictions of a withdrawal or classification in effect on January 1, 1981, including but not limited to the issuance of leases, the sale, exchange, or disposal of land or interests in land, the granting of rights-of-way, or the approval of any plan of operations.

measures such as seasonal restrictions, no-surface-occupancy (NSO) and not leasing oil and gas in the East Fork Elk Winter Range, the Whiskey Mountain Bighorn Sheep Range and Sweetwater Canyon. In addition, other resource uses such as recreation and livestock management are affected to some extent by wildlife habitat considerations. The Preferred Alternative in the plan strikes a balance with all uses including oil and gas.

3. It is not our intention to infer that nothing can be done to protect wildlife habitats from the adverse impacts of oil and gas developments via planning decisions. On the contrary, we have proposed a variety of actions which will protect most of the important habitats over most of the Lander Resource Area.
4. No-surface-occupancy and other site specific stipulations are very effective protection measures to mitigate impacts from oil and gas exploration and development. See Response 1 to Letter 537.

The two types of NSO stipulations we use are described in the Final RMP/EIS. Any waiver of the area-wide type of NSO restriction called for in the plan would require an amendment to the plan including a complete analysis and public participation.

5. See Response 1 to Letter 537.
6. As is the case with any other resource area program, our ability to ensure operator compliance with BLM use authorizations, including oil and gas leases, is dependent upon approved budgets. The Lander Resource Area minerals staff includes three positions assigned to inspection and enforcement of oil and gas activities within the resource area. In addition, all other minerals staff positions (nine) within the resource area are responsible for ensuring operator compliance. Based upon current funding levels and industry activities, we believe we can conduct an effective enforcement program. Under current laws and regulations, there is a wide range of enforcement actions available to the BLM, to ensure operator compliance, up to and including monetary assessments, civil penalties and lease cancellation. As stated before, we feel we have in place an effective enforcement program consisting of a vigorous inspection program supplemented by enforcement actions required to ensure operator compliance.
7. See Response 1 to Letter 15.
8. Segregation of all of these habitats (perhaps 20 percent of the resource area) is unnecessary for adequate protection of wildlife values.

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and gas industry (the rationales used to modify such stipulations are even stated in the draft of 1983), and occur away from public scrutiny and participation in such decisions.

- 5 Moreover, the Acting Regional Solicitor for the Rocky Mountain Region has concluded that the Department "cannot use... (a no surface occupancy) stipulation as an instrument to violate the inalienable right to the lease by the Mineral Leasing Act." (Memorandum from the U.S. Department of the Interior, Office of the Solicitor, Acting Regional Solicitor, Rocky Mountain Region, to John Hestis, U.S. Geological Survey, October 10, 1980, p. 23). So, for the Bureau to assert that critical environmental resources such as wildlife and wildlife habitats can be protected via NSO stipulations is simply a sham.

- 6 Furthermore, the record to date of the Bureau's ability and willingness to enforce stipulations is not a good one. No data is provided in the draft plan on the type of enforcement program proposed by the Bureau to assure that seasonal restrictions on oil and gas exploration or other activities are complied with. Does the Bureau have sufficient personnel in the Lander Resource Area? Does it have funds available in its yearly budget to provide for an effective enforcement program? Are there enforcement actions available to the Bureau against lessees who violate the terms of their leases? Are there penalties for non-compliance with lease stipulations? If so, does the Bureau have a vigorous policing program to assure compliance with lease stipulations, and does it take action against violators of lease stipulations?

Effective means of protecting wildlife and important habitats are available, obvious, and necessary given the documented problems oil and gas exploration and development activities cause wildlife, problems which are acknowledged in the draft plan:

...many wildlife professionals have long opposed the legislation of additional, unusual non-oiland acres, such as that inherent in oil and gas industry activities, on wintering big game herds. Oil and gas activities can cause additional negative effects on environmentally stressed big game herds on winter ranges. (p. 192)

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- 7 It is clear from statements throughout the draft that a good deal of data has been collected on the critical habitats of various wildlife species (see, for example, pp 18-19, and pp. 188-195). The Bureau should fulfill its obligations under FLPMA and ESA to protect wildlife and their habitats by carefully delineating areas such as crucial winter habitats, calving areas, escape and critical cover areas, etc., for each species, designating these habitats Areas of Critical Environmental Concern, and segregating them from mineral development. We recommend that this method of habitat protection be used in all management units where crucial winter, nesting and parturition areas, riparian areas, and endangered species habitats have been identified in the plan.

LOCATABLE MINERALS

The same head-in-the-sand approach taken by the Bureau with respect to oil and gas activities is proposed with respect to locatable minerals. According to the preferred alternative, 98 of the resource area would be open to mineral location (p. 99). And the Bureau is enthusiastic about this because:

The mineral resource would benefit by being available for discovery and development over almost the entire resource area. (p. 271)

We submit that because minerals are largely inessential, these individuals and companies who are in the business of making money from mineral exploitation will benefit from the more-balanced policy offered in the preferred alternative. In the instances noted above (p. 3 of our comments) where the Bureau has illogically restricted protective land use classifications in the South Pass and Green Mountain Management Units, those individuals who located claims subsequent to the units' three individual use located claims subsequent to the classification termination will benefit at the expense of the fish and wildlife habitat once carefully protected from mineral development.

- 8 We recommend that the Bureau protect crucial habitat areas, such as crucial winter habitats, nesting and parturition areas, riparian areas, and endangered species habitats by segregating them from mineral location.

was used to calculate the percentage figures in Part C of the Final Grazing Supplement, as well as the percentages shown in the description of the climate and range sites.

14. Any new range improvements, like water developments, would be subjected to economic and environmental assessments prior to construction. BLM consults with the Wyoming Game and Fish Department and asks for their review and recommendation on any water development or fencing prior to the construction of the project. BLM wildlife biologists are involved in the development, review, and implementation of any project that could impact wildlife species.
15. Before all herbicide projects are initiated, a pesticide use proposal (PUP) is prepared for review in the BLM Washington Office. If approved, an environmental assessment (EA) is then prepared for the project. In the EA this buffer zone may be widened if necessary.
16. Improvements in habitat condition for wildlife species is one of the primary goals for management of I category allotments. Habitat condition is based on several of the factors discussed under the categorization and management actions for I category allotments. In particular, factors one, two, three, and four are all closely related to improving range and habitat conditions for all the grazing animals.
17. See Response 3 to Letter 294.
18. See Response 15 to Letter 537.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

According to FLPMA, the Bureau is required to "give priority to the designation and protection of areas of critical environmental concern" (43 USC 1712(c)(3)). ACCEs are defined as:

... areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards. (43 USC 1702(a))

The draft plan's treatment of ACCEs is perplexing and confusing. Over short paragraphs on page 105 represent the sum total of discussion regarding ACCEs. The Oregon/Norron Creek and the South Fork, Red Canyon, Lander Slope and Dubois Badlands Management units are all proposed for ACCE designation under the preferred alternative (p. 324). However, critical winter elk habitat and highhorn sheep habitat in the East Fork and Whiskey Mountain management units are not so designated. Despite the proposed ACCE designations on page 324, none of the management unit descriptions of alternatives in Appendix I acknowledges this designation as part of the preferred alternative. Moreover, oil and gas leasing and development are allowed in the preferred alternative in the South Fork (pp. 339-402), Dubois Badlands (pp. 418-419), Red Canyon (pp. 393-395), and Lander Slope units (pp. 387-389), although the "no action" (current management) prescriptions close the Lander Slope, Red Canyon, and Dubois Badlands units to oil and gas activities. In other words, more protection for wildlife is afforded these management units under the Bureau's current management direction, than under proposed ACCE designations or the preferred alternative. This makes no sense. If these areas are to be designated as ACCEs, then they should remain closed to oil and gas leasing and development activities.

Furthermore, in the case of Whiskey Mountain, the narrative describing the preferred alternative (p. 276) proposes that the area be "closed to oil and gas leasing, exploration and development, resulting in significant long-term benefits to the nationally significant highhorn sheep herd. Yet, no management designation (such as an ACCE) is proposed for the area, nor are any administrative actions proposed (such

as a withdrawal) to protect the area from the mining and mineral leasing laws.

With respect to the East Fork management unit, the narrative on page 275 notes the existence of a number of critical wildlife values which need special management attention ("elk and highhorn sheep ranges, stream fisheries, and several high priority standard habitat areas", yet no specific management designations or actions are proposed to protect these resources. And although the area is apparently currently closed to leasing under the "no action" alternative, it is proposed to be open to oil and gas leasing but closed to mineral location under the "preferred alternative" (pp. 413-415).

To add to the confusion BLM has created with respect to the future of these management units, the Wyoming Game and Fish Department (WGFD) has pointed out that the Red Canyon, East Fork and Whiskey Mountain winter game ranges have been governed by cooperative agreements between the BLM and WGFD for many years. These agreements basically disallow mineral leasing in these areas. According to WGFD:

...the FIS recommends leasing of minerals in these two areas. This contradicts all previous agreements. Although a MOU stipulation is recommended for all leases granted in these areas, we do not feel this concession meets the intent of past agreements. (Letter from Francis Peters to Warren White, re. BLS 2547, January 10, 1985, p. 4)

The WGFD further points out that the wildlife values on the Whiskey Mountain and East Fork Management Units are of national significance, vital to the long-term economy of the Dubois area, and are therefore recommended for mineral withdrawal.

We recommend that these inconsistencies be resolved in the following manner:

1) Designate critical habitats within the South Fork, Dubois Badlands, Red Canyon, Lander Slope, Whiskey Mountain, and East Fork units as ACCEs;

2) Continue the current mineral leasing closures in the Lander Slope, Red Canyon, Dubois Badlands, and East Fork units,

- 9) Impose mineral leasing closures within the proposed Whiskey Mountain and South Pass AEC designations;
4) Subrogate all of the designated ACECs within these units from mineral location.

LIVESTOCK GRAZING

- 10) Proposed alternative: Which alternative is the "proposed" alternative? One gathers from the context of narrative that "alternative A" is the "proposed alternative", but we could find no explicit statement of this fact in the narrative.
11) Why is there no information on forage allocations between livestock and wildlife in the grazing supplement?
According to the description of actions to be taken under "alternative A" to improve category "1" allotments in the planning area:

All management actions for the allotment would be implemented after consultation with the affected parties. After establishing objectives, a monitoring program would be developed to evaluate the effectiveness of the present management situation in achieving those objectives. Objectives would be developed to ensure protection to watershed, soils, wildlife habitat, and vegetation. If the objectives were not being achieved, allotment management plans would be developed and would incorporate... specific management actions. (p. 11, grazing supplement)

- 12) Why aren't ANPs being developed as a first step in making the necessary improvements in "1" category allotments? How long will the consultation, objective setting, and monitoring activities take before actions are initiated or ANPs developed to correct unsatisfactory conditions on the 38 "1" category allotments? Will program personnel responsible for watersheds, soils, wildlife habitat, and vegetation be involved in defining these objectives and developing appropriate management responses? Why may stocking levels in "1" category allotments be increased "when appropriate" (p. 11, grazing supplement),

when reductions require the Bureau to jump through numerous self-imposed hoops? Why is there no data requirement for "1" category allotments which are proposed for stocking increases?

It is quite apparent that what the Bureau has proposed here is a long-range stalling tactic designed to delay the inevitable changes which must take place on "1" category allotments. This may well serve the permittees who use these allotments, but it ill-serves the public which has an interest in rehabilitating rangelands which have deteriorated as a result of decades of poor grazing management practices.

- 13) Range condition: According to a statement on page 15 of the grazing supplement, 360,473 acres - or 42% - of the study area consists of grazing allotments which are in "unsatisfactory" condition. However, data presented on page 21 indicates that 380,919 acres are in either "fair" or "poor" condition. Since the Bureau considers rangelands in "fair" and "poor" condition to be unsatisfactory, what accounts for the 179,554 acre discrepancy between those areas considered "fair" and "poor" on page 21, and those areas considered "unsatisfactory" on page 15?

Also, which acreage figure comprises the "study area" upon which the percentages presented on pages 15 and 21 are based: 1.7 million acres (p. 1), 1 million acres (p. 1), 939,435 acres (p. 21), or some other figure?

These questions arise because if the 360,473 acre figure on page 15 is used for the total amount of "unsatisfactory" rangeland in a study area comprising 939,435 acres indicated on page 21, then approximately 80% of the study area's rangelands are in unsatisfactory condition, rather than the 39.13% "fair" plus 6 percent "poor" indicated on page 21, or the 42% on page 15.

- 3) Range improvements: According to the following statement on page 33 of the grazing supplement:

Water development projects and fence construction would improve the distribution of livestock over the entire area and promote a more even utilization of the forage... Properly placed water developments, combined with grazing systems, would cause the livestock to move from the overused areas around existing water sources...

- 14 We recommend that the Bureau keep in mind the potential adverse impacts on some wildlife species, such as elk and bighorn sheep, of encouraging cattle movement into previously unused areas. Such improvements for livestock grazing can cause competition with wildlife where none existed previously. Such impacts should be assessed and the proposed improvements approved by BLM wildlife personnel and the Wyoming Game and Fish Department prior to the installation of such improvements.

4) Weed and pest control. According to the following statement on page 37 of the grazing supplement:

Burning or spraying of sagebrush would be used to modify these vegetative types.

Prior to these treatments, the Bureau should consult with its wildlife professionals and the Wyoming Game and Fish Department to assure that crucial winter habitats for big game species such as mule deer and pronghorn antelope are not adversely affected. (This problem is acknowledged on page 38 of the grazing supplement.)

- 15 Also, the Bureau states that a 200-250 foot buffer zone from streams would be observed for aerial spraying, plus a buffer zone of indeterminate distance from "water and tanks" (p. 9, grazing supplement). The proposed buffer zone from streams seems a very short distance for aerial spraying, especially given the complex topography of much of the planning area. We suspect at least a 300 foot buffer for aerial spraying from all water bodies.

5) Livestock/wildlife competition. According to a statement on page 37 of the grazing supplement:

In the short term, competition for available forage between grazing animals would continue, and the condition of big game habitat on Category 2 allotments would either remain unchanged or gradually deteriorate. In the long term, the condition of big game habitat would probably improve on most Category 2 allotments.

- 16 Improvements in habitat condition for all wildlife species should be a primary goal of range rehabilitation efforts in "1"

- 16 category allotments. The potential for such habitat improvement appears to be an afterthought, as described here,

6) Re-introduction of bighorn sheep into the Sweetwater Rocks area. The draft plan describes the suitability of the Sweetwater Rocks area for re-introduction of bighorn sheep, noting that:

Since this area is historically bighorn sheep range and adequate forage is present to support a large bighorn sheep herd, this treatment would establish another viable herd of bighorn sheep. This action would provide significant long-term benefits to the perpetuation of Rocky Mountain bighorn sheep by reintroducing them to historical range.

...Reintroduction of bighorn sheep into the Sweetwater Rocks would be a significant beneficial impact. (p. 246)

Unfortunately, in describing the proposed alternative for bighorn sheep management in the Sweetwater Rocks area, the draft plan equivocates on the issue of re-introduction (p. 276). We believe that the habitat suitability of the area argues strongly in favor of the reintroducing bighorn sheep.

The development of a viable herd in this area is especially important in light of the proposed management actions in the Lander Slope and Red Canyon areas where, according to the draft plan, "...the risk of overgrazing and displacing wintering big game [including bighorn sheep] on the Lander Slope and Red Canyon Management Units would increase under the preferred alternative." (p. 276) Similarly, the bighorn herds in the East Fork, Durbin, and Dubois Basins management units will all be exposed to additional stress and disturbance in the preferred alternative, increasing the risk of die-offs (p. 275).

RIPARIAN AREAS

As in other resource areas, riparian zone/aquatic habitat management should be a primary concern of the BLM in the Lander resource area. The scarcity of, importance of, and high demand for this resource dictates the need for a rigorous plan for maintenance, improvement, and rehabilitation of these important habitat areas. While less than 1 percent of the public lands

administered by the BLM throughout the West are considered to be riparian areas, their use as habitat for wildlife is disproportionate to their occurrence. Because BLM's riparian areas exist in the arid and semi-arid regions of the West, such as the Lander Resource Area, the water, food, and cover afforded by them are often very important habitats for a wide variety of game and non-game avian, aquatic, and terrestrial species. And because of their association with surface and subsurface water, they are generally very responsive to restoration efforts. Unfortunately, the proposals contained in the draft plan fall far short of the management attention this important resource deserves.

- 17 The omission of quantitative and qualitative data regarding riparian habitats in the Lander Resource Area is a very serious defect of the draft plan. Other than the categorization and monitoring of five trout streams where grazing/fisheries conflicts exist, the plan fails to provide detailed data on the location, conditions, and proposed management of riparian and other wetlands areas in the Resource Area. While the BLS acknowledges the importance of these areas, its lack of attention to this important resource suggests a severe lack of monitoring activity in the field. And accordingly, no corrective measures are proposed.

In its limited discussion of riparian areas, the Bureau admits that "poor riparian conditions are in evidence along many of the affected streams" (p. 79). Furthermore, the draft plan concedes that poor management practices in "grazing, fire suppression, herbicide spraying, and lack of beaver management are probably responsible for the majority of loss of woody streamside vegetation" (p. 79). Despite this admission, in the proposed grazing alternative the majority of "A" and "C" category allotments continue to see the majority of riparian areas held below their potential (p. 52). With a significant portion of riparian areas in declining condition, confining riparian management attention exclusively to proposed (and probably illusory) livestock management improvements in the "A" category allotments ignores the need for appropriate riparian management activities elsewhere in the resource area.

As a result of the loss of streamside vegetation in the resource area, these aquatic habitats are in a severely deteriorated state due to thermal pollution, sedimentation, and eutrophication. For example, over a two-year period, the fecal

- 17 polliform counts in both the Wind and Sweetwater River systems have increased ten-fold (pp. 78-79). However, no detailed program to combat this aquatic degradation is proposed. In fact, outlined fisheries management schemes call for concentrated efforts in only two of ten management units (Beaver Creek and South Pan), despite the fact that the "Dubois vicinity has large, important streams that contain several species of gamefish" (p. 83). Based solely on the biological data presented in this draft, the riparian semi-aquatic habitat management is obviously in dire need of improvement.

- 18 We propose that the following steps be taken to correct this severe management deficiency: (1) preparation of a comprehensive inventory of the extent and condition of all riparian areas within the Lander Resource Area, followed by (2) the development of proposals to restore, improve, and properly manage these areas, and (3) the implementation of such proposals and the continued monitoring of riparian area status.

CONCLUSION

Given the severe deficiencies of the draft Lander RMP, we urge that the recommendations made above be assessed in a revision of this draft, prior to the issuance of a final plan.



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
2222 Capital Avenue, Room 7020
Cheyenne, Wyoming 82002

WLBK/1058 RD

February 13, 1986

Memorandum

To: Area Manager, Bureau of Land Management, Lander Resource Area,
P.O. Box 888, Lander, Wyoming 82420

From: Project Leader, Ecological Services, Cheyenne, Wyoming

Subject: Review of Lander Resource Management Plan
Draft Environmental Impact Statement (DEIS)

We have reviewed the Subject Statement, and the following constitutes the comments of the U.S. Fish and Wildlife Service (FWS). We found that the DEIS identified most issues and offered management options under at least one of the proposed alternatives that would benefit wildlife. The use of program objectives under the different alternatives, makes it difficult for us to support any one of the alternatives as stated. The preferred alternative appears reasonable in most cases; however, we are concerned with the relaxing of wildlife stipulations for oil and gas leases, and the magnitude of public lands disposal.

1. The status of local oil and gas industries is important, but protection of wildlife and aquatic resources should also be a primary consideration. The most important method for mitigating the impacts of oil and gas development involves good reclamation practices and avoidance of sensitive areas. Laterally, on slopes of less than 15 percent gradient, successful reclamation can be expected, with success rates decreasing dramatically on steeper slopes. With these points in mind, we strongly recommend limited development on slopes with areas less than 25 percent gradient and timely reclamation of disturbed areas. We also recommend that seismic operations be restricted to when the soil is dry or frozen to minimize vegetative cover loss and soil compaction. We also support Wyoming Game and Fish Department's recommendations that crucial elk winter ranges in the Lander Slopes, Green Mountain, and Red Canyon management units carry a "no-surface occupancy" stipulation, and that the Shirley Mountain Disposal should allow winter range and the East Fork elk winter range should be withdrawn from mineral title and gas leasing as stipulated in existing BLM Cooperative Agreement and HMP's.
2. The DEIS contains many good, protective wildlife measures that should be incorporated into oil and gas leases to protect important wildlife resources. We are, however, concerned with the reluctance of BLM to add restrictions to existing oil and gas leases and the

2. The tendency to waive existing no-surface occupancy and seasonal restrictions, is difficult to understand why BLM cannot modify existing oil and gas leases to protect other natural resources. In this regard, we recommend that the statement on page 19 "McNALLY" which indicates that BLM cannot unilaterally change the terms and conditions of existing leases, be further clarified by referencing regulations or legal opinions.
3. Pertaining to raptor protection, we recommend that the nests of the listed nonmigratory raptor species receive the following seasonal restriction protection:

Golden eagle.....	February 15 - July 15
Osprey.....	April 15 - August 15
Prairie falcon.....	March 15 - August 15
Mourning dove.....	April 15 - August 15
Ferruginous hawk.....	March 15 - August 15
Coscor's hawk.....	April 15 - August 15
Burrowing owl.....	April 15 - July 15
Swainson's hawk.....	April 15 - July 15
Sophom.....	March 1 - July 31
Red-tailed hawk.....	April 1 - July 15

Application of raptor nest protective measures is dependent upon adequate inventories to identify potential conflicts before surface disturbing activities are permitted. If adequate inventories are not available, as is the case in many portions of the Resource Area, we highly recommend that your wildlife staff conduct an on-site inspection of the project to ensure raptor nest protection. As a general guideline, we recommend that a three-quarter mile radius buffer zone be maintained around each raptor nest. Smaller buffer zones could be designated on a site-by-site basis after consultation among BLM, state, and FWS biologists. Topographic relief, vegetation density, or other circumstances may allow reduction of buffer zones in some situations.

4. A significant increase in timber harvest is proposed under the preferred management alternative to accelerate the rate to three or four times the sustained yield in order to salvage beetle-killed reserves. We question the justification for this increased harvest, if it would be detrimental to oil and wildlife resources (i.e., timber harvest would maintain a "no cutting" protective buffer zone of at least 100 feet, measured laterally, from both edges of all perennial streams. We support the objective of the Lander Disposal management unit to maintain a refuge of 40

Response to Letter 539

1. See Response 1 to Letter 15 and Response 3 to Letter 12.
2. See Response 1 to Letter 537.
3. See Response 3 to Letter 12.
4. See Responses 2 and 3 to Letter 537.

Most of the streams on the Green Mountain area are intermittent. On the few perennial streams, there are usually beaver dams and wide areas of riparian vegetation, with no trees, or the banks alongside the streams are too steep to log.

If any logging is done, it will be done very carefully to minimize any potential soil damage. We feel that this will cause no detrimental effects to wildlife habitat. All sales will be coordinated with the Wyoming Game and Fish Department (WGFD).

5. The Lander RMP provides general guidance for resource management. In respect to landownership adjustments, the plan would allow disposal opportunities for the parcels that have been identified. However, the disposals are still subject to environmental assessment. We share your concerns for wildlife habitat, and would assess any impacts during the specific analysis which will influence decisions for ultimate disposal. Exchanges are usually our first preference in disposing of land when public lands can be consolidated or conflicts can be resolved, but exchange is not always appropriate or feasible for a variety of reasons. All disposals are subject to environmental assessment which will entail a site specific analysis of impacts on all resources including wildlife habitat and recreation opportunity. Disposal of the tracts in the East Fork Management Unit would be limited to exchanges or sales to wildlife management agencies or organizations which would continue to manage the area as a big game winter range. We encourage you to develop exchange proposals for any of the identified parcels which might meet your program needs. We will add your office to the mailing list which provides notifications of land disposal actions.
6. Alternative A proposes to reduce livestock grazing 13 to 19 percent in Improve category allotments as well as constructing the range improvements listed on Table B-8 in Appendix B, in the Final Grazing Supplement. Alternative A provides for forage allocations to be made if the monitoring information indicates a need to adjust various grazing animal use levels on individual allotments. In the long term, Alternative A would benefit and improve wildlife habitat and riparian areas within the Lander Resource Area.

4 Percent cover to 60 percent forage on elk summer range. This cover/forage ratio should be a goal in the other timber management areas. All timber sales should also include the AMP to protect and maintain important fish and wildlife resources.

5 We have serious concerns about your agency's plan to possibly dispose of 13,000 acres of public lands within the Lander Resource Area. Scattered parcels of public land can provide refuges for wildlife in areas where the habitat values of private lands have been altered or severely impacted. Disposal of public lands may also severely impact the opportunity for outdoor recreation, such as hunting and fishing. Scattered land parcels may seem difficult to manage; however, a policy of selling many of these parcels retains natural or reverts to natural conditions requires minimal BLM management. In cases where the plan is to dispose of a tract, we recommend an equitable land exchange rather than outright land sales. Land sales and exchanges could also influence FWS programs. Currently, land exchanges are one of the best methods for FWS to acquire needed lands. We are particularly interested in riparian and wetland areas that now support, or could be managed to support, waterfowl and migratory birds. In cases where the proposed plan does not fit our program needs, BLM has the responsibility to ensure protection of our wetlands and riparian areas when they are transferred to the private sector, as required by Section 202 of FLPMA, Executive Order 11980, and Bureau policy as set forth in BLM Manual 6740.01(c)(1). Please seek an office agreement of plans to dispose or exchange any of the lands in question.

6 Grazing Alternative C seems to be the preferred alternative to protect wildlife resources. However, we believe that a more realistic alternative would be a combination of reduced livestock (Alternative C) and incorporation of the range improvements that would benefit wildlife contained in Alternative A.

A major concern to us is the existing condition of riparian and aquatic habitats in the Resource Area. The DEIS indicates (page 787) that poor riparian conditions are in evidence along many streams, and significant woody riparian vegetation has occurred over the last 50 years in many areas from grazing, fire suppression, herbicide spraying, and lack of stream management. The cumulative impacts have led to riparian areas that little significant improvement could be expected for streams in the deer hill grazing area without a change in grazing management and some overgrazed riparian zones in the Great Mountain grazing area would continue to remain saline (page 787).

To maintain livestock forage production at the proposed higher levels, intense management will be required to protect riparian zones, wetlands, and livestock forage production. We recommend that grazing pressure be limited to a 60 percent utilization level on riparian areas. However,

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7 Livestock access to riparian or streamside zone in fair-to-poor condition may still have to be restricted further to allow for woody vegetation recovery and maintenance. With respect to streambank stability, water quality, and the timing of grazing in the riparian zone, recent research by BLM in Wyoming indicates that stream banks are most unstable when soil moisture is highest, i.e., in the spring. Specifically, limiting cattle numbers in the riparian zone during spring did not significantly reduce the total amount of bank slumping caused by cattle, and water quality was adversely affected. We suspect that cattle be kept away from streams with unstable banks during seasons when soil moisture is high, until such time has elapsed when bank stability has been restored. We strongly recommend that sensitive areas be fenced to exclude cattle when the presence of cattle is shown to cause adverse impacts to water quality, stream bank stability, vegetation, as well as riparian shrub and tree regeneration. In addition, plans for managing livestock during drought years should be developed with full consideration for riparian and aquatic zones.

8 Another area of concern is propped brush and noxious weed control in the vicinity of streams, sage grouse strutting grounds, and on wildlife winter range. We recommend a two-mile buffer zone that prohibits brush and noxious weed control around sage grouse strutting grounds to protect nesting and brooding areas. In addition, no brush control work should be conducted on wildlife wintering areas without concurrence of Wyoming Game and Fish Department (WGFD). Woody riparian vegetation should also be protected for its high value for fish and wildlife. In riparian areas, we recommend against the use of persistent water soluble herbicides such as Torlon, and that noxious weeds be treated with selective tools, such as the wick applicator. The use of Torlon adjacent to streams with reproducing populations of trout and steelhead is prohibited. Research conducted by Dan Johnson of the FWS Field Research Laboratory, Jackson, Wyoming, indicates that Torlon is very toxic to young-of-the-year trout.

9 Coordination under provisions of Section 7 is not to be confused with Section 75 and BLM. Specific endangered species concerns or issues will be addressed by FWS at a later date through the consultation process. The Section 7, Endangered Species Act consultation should be included in the final EIS.

Thank you for the opportunity to comment on the DEIS. If you have any questions, we can be contacted at (307) 772-2374.

Arthur Anderson

CC: Regional Director, FWS, Denver, CO (HR) MAIL STOP: 60300
Field Supervisor, FWS, Billings, MT (ES)
Lead Examiner, FWS, Helena, MT (ES)
Director, WFS, Cheyenne, WY
State Director, BLM, Cheyenne, WY

6

7. See Response 3 to Letter 294. Alternative A proposes two management actions that incorporate the comment's recommendations for riparian area management. Where the distribution of grazing animals is not satisfactory because significant problems exist from livestock concentrating around wetlands, riparian areas and meadows; the first management action would be to implement grazing systems and/or range improvements to solve the concentration problems. Specific management objectives would be established in the AMP for allowable utilization levels on these key areas where they are public land. Further, total exclusion by fencing out the livestock for several (3 to 5) years would be implemented on riparian areas that were not recovering under the grazing management system.

The second management action proposed is to delay turnout dates and/or season-of-use for livestock to provide for range readiness. This management action incorporates the range management principle that livestock grazing would be delayed in the spring until the soil was firm and dry enough to avoid significant soil damage. Reducing livestock trampling would reduce soil compaction, increase soil structure stability, increase soil infiltration, and increase plant litter accumulation. These positive impacts would be more evident on heavier soils along streams, in meadows, and on steeper slopes.

Livestock management during drought years on public lands is currently provided for in the Federal Range Code. The regulations state that "When authorized grazing use exceeds the amount of forage available for livestock grazing within an allotment on a temporary basis: (1) due to drought, fire, or other natural causes, . . . grazing permits or leases may be suspended in whole or in part."

8. The noxious weed control program in Wyoming is administered by BLM and the Wyoming State Department of Agriculture through a cooperative agreement. The agreement provides that the BLM Districts and the Wyoming weed and pest control districts will enter into contracts where the program is needed and funds are available. The Wyoming weed and pest control districts do the actual weed control work and are reimbursed by the BLM Districts through the contract. Wyoming State Department of Agriculture instituted Wyoming's Herbicide Monitoring Program in 1977. It was instituted to protect the health and environment and to ensure the program met all federal and state standards. Records are available covering the program activities from 1977 through 1984.

County weed control officials and BLM district and resource area representatives meet at least annually concerning the proposed control action for that year. At these meetings, all safety and environmental concerns for the proposed treatments are reviewed and needed restrictions addressed.

Section 202(c)(9) of the Federal Land Policy and Management Act requires BLM to develop resource management programs consistent with those of state and local governments to the extent that such BLM programs are also consistent with federal law and regulations.

The Wyoming Game and Fish Department (WGFD), by state statute, manages all wildlife in Wyoming, including those on BLM lands. Because BLM manages wildlife habitat on the lands it administers, cooperation on all factors affecting wildlife populations or habitat is coordinated through a memorandum of understanding with the department. This WGFD-BLM MOU states: 'Where proposed projects involve mechanical or chemical control methods, the following additional procedures will be followed: Control of sagebrush will be avoided on areas identified as (1) sage grouse strutting, nesting, brood-rearing and winter concentration habitat, (2) antelope and deer fawning grounds and winter concentration areas, (3) elk calving areas, (4) wildlife wintering areas where sagebrush is an important source of winter food supply or cover, (5) along riparian habitat, (6) in other critical wildlife habitat areas. Exceptions to this are those situations where brush control will have a definite beneficial effect on the wildlife habitat or when, on an individual site basis, a critical watershed problem can clearly and obviously be solved by brush control.

Because private landowners are highly interested in BLM operations near their land, BLM strives to keep adjacent landowners informed about its noxious weed operations. Before preparing environmental documents at the state or district level, BLM invites interested landowners to comment on proposed programs. Before applying aerial herbicides, BLM informs local newspapers and all residents and contiguous landowners within a half-mile of spray sites.

Label directions are followed and the application supervised by a State of Wyoming Certified herbicide applicator. Tordon (2K and 22K) is not the preferred herbicides used on groundwater recharge areas and areas where surface water contamination would be likely to occur. In such cases, the herbicide Banvel (Dicamba) is preferred because it will break down and not persist more than several

months. Also, "present evidence reveals no mutagenic or carcinogenic potential of dicamba. . ." (Final BLM Noxious Weed EIS, 1985).

9. The Endangered Species Act consultation process documentation will be included in the Final Lander RMP/EIS.

548



Chevron USA Inc.
700 South Colorado Blvd., P.O. Box 598, Denver, CO 80201

M. W. Lusk Platte
Soil Research
Loganville and Philadelphia, Illinois

February 14, 1988

Draft RMP/Wilderness Study
Lander Resource Area

Mr. Jack Kelly, Area Manager
Lander Resource Area
Bureau of Land Management
P.O. Box 188
Lander, Wyoming 82520

Dear Mr. Kelly:

- 1 We are in support of your Preferred Management D, because it recognizes mineral resources as a priority consideration along with sensitive resource values. However, we would like to see some minor changes to your proposal.
Your plan shows that certain tradeoffs were made between energy and mineral resources and sensitive values, but the problem is that this was done only where the mineral potential was considered significant enough to warrant top consideration. We request that this tradeoff analysis be expanded to areas with moderate oil and gas potential. According to Table 4-1, on page 191 of the Proposed Plan, almost no wells are drilled in areas of moderate potential as in high potential areas. This indicates that the oil and gas industry recognizes those moderate potential areas as significant exploratory areas also, and the rationale for adding more severe constraints to those areas is not clear.
- 2 Secondly, Wyoming maintains over 3 million acres of wilderness. Your recommendation for more wilderness just for the sake of creating more wilderness at the expense of oil and gas leases who would lose their rights on existing leases, is unjustifiable. We want to mitigate adverse impacts, and are willing to cooperate with you to ensure that this happens. However, once an area is designated as wilderness, almost all of the multiple uses allowed on other federal lands are prohibited.
- 3 Thirdly, we request a more specific discussion of the RSD stipulations. We understand that there are 2 types of RSD stipulations: those that may be waived and those that are mandated. We would like to know what types of RSD stipulations are being referred to on page 189, where you state that 850,000 acres of the Lander SA area subject to RSD stipulations, as well as in Table 2-3 on page 43, where you state that 171,000 acres are subject to those stipulations.

Northern Region - Exploration, Land and Production

Response to Letter 548

1. See Response 1 to Letter 12.
2. See general response to wilderness comments.
3. See Response 3 to Letter 12.

February 14, 1986

We appreciate the great lengths that your group has gone to in order to compile this report, and applaud you for your recognition of the necessity to keep the Lander Resource Area open to oil and gas activity. You provide the oil and gas industry the opportunity to operate if it can mitigate adverse impacts. We hope you will take our three recommendations into account so that the oil and gas industry may have an even greater opportunity to operate with due care in your resource area.

Sincerely yours,



MP:dl

561

George D. Langstaff
P.O. Box 1270
Lander, Wyoming 82520

February 11, 1986

Mr. Jack Kelly
Bureau of Land Management
P.O. Box 559
Lander, Wyoming 82520

Dear Mr. Kelly:

The Lander Resource Area Management Plan and Draft Environmental Impact Statement is an impressive document. I congratulate the Lander staff on their professional job in synthesizing, compiling, writing, and editing. There are fewer spelling, grammatical, and typographical errors than in most newspapers. I do wonder about the word "suppliment" though (p. 165). I know everyone worked hard to produce a document they could be proud of but I don't imagine that this is what "suppliment" led to. Rather than point out the clerical errors and the indefinable documents that it exposes, I will try to limit my comments to substantive matters. (If an assumption that because there is a comment period, you must want comments.)

With regard to the plan itself rather than the management it proposes, the lack of a detailed map showing BLM lands, other mentioned in the text, and relevant data on a topographic base is a serious shortcoming. Section lines aren't marked on the ground. Most of the maps are useless without reference to a topographic map and I don't have all the necessary maps. Maps 3-20, 3-21, 3-22, 3-23, 3-24, 3-25, 3-26, 3-27, 3-28, 3-29, 3-30, and 3-31 were particularly revealing. Maps in chapter 3 are a little better but it was still difficult to determine what is being planned for the areas I know.

The very general nature of the management plan does not lend itself to comment. It seems reasonable. It allows a wide range of uses and recognizes limited restrictions. Management is directed toward utilizing available resources and strikes a balance between conflicting interests. It would have been a good plan . . . 20 years ago. It fails to recognize the reality of late 20th century America. The debt is settled. The public land can no longer satisfy all the competitive claims for their use. Choices must be made. Furthermore, the present administration, as demonstrated by the management of public lands in generally a national sense. All your plans will come to naught if you don't have the budget to implement them.

Maybe that is why the plan is so wishy-washy: "If a certain proposal is determined to be consistent with the objectives of the BLM (whenever are these objectives stated), it could be approved without preparing a planning document"; "projects would be completed after appropriate review and would be consistent with program (what program?) capabilities and priorities"; "adequate protection of significant surface resources could be achieved through the approval process (what criteria? for the plan of operation?); "rights-of-way . . . rights (under what conditions?) be granted if no feasible alternative route . . . were available"; "these restrictions could be waived if appropriate (what constitutes appropriate?)" "BMP actions would be

Response to Letter 561

1. The plan is intended to anticipate and prepare for the future beginning the day it is approved. The goals that we intend to accomplish are listed in the Preferred Alternative of Table 2-2 in Chapter II. They are analyzed for impacts in the Preferred Alternative portion of Chapter IV, Environmental Consequences; they are discussed again by resource in Chapter V, The Preferred Alternative Plan; and they are summarized by resource in each management unit in Appendix 1. To summarize, the goals are to identify issues and conflicts, and then present management actions to resolve them in a manner that provides the most benefits. The term of the planned actions is generally 10 years; although it can be amended prior to that if a public need so dictates; and it can remain effective longer if still valid for the affected resources.

Your suggestion for conservation of naturalness and scenic qualities is indeed one of the most important facets of the plan and numerous development restrictions are recommended to accomplish that goal.

2. See general response to wilderness comments.

analyzed. . . and decisions as to compatibility (how do your design what is compatible?) with the unit's resource values would be considered. . . I can't figure out what your plan is.

I confess I do not know BLM's regulations or the laws governing the use of public lands. Maybe if I did, I could understand your plan. In any case, I have always thought that plans were supposed to anticipate and prepare for the future. Chapter 1 does an admirable job of summarizing the current status of the land. It has a lot I didn't know about. But where do you state what you hope to accomplish? And do you want the Lander Resource area to be like 20 or 30 years from now? In the plan, I don't see a clear picture of what you envision for the future, nor even any well defined goals. Let me offer a suggestion: to conserve the lands in their natural state as much as possible and to preserve their scenic qualities.

Roads, utility lines, and surface disturbing activities associated with petroleum and mineral exploration and development and logging are the most serious threats to scenic resources in the Lander area.

The local shabbers of resource might one day realize that tourism can be big business. Scenic and fishing areas in the National Forest are already crowded. Here, not everyone can drive into the wilderness areas. Anyone can drive out to the Oregon Trail, Sweetwater Fork, or just about anywhere they please. The existing network of roads and double-track trails is more than extensive enough. One can drive by, or to witness any willing distance of most areas of interest. Unfortunately, many people prefer to make their own roads. Whether it's for a scenic line, access to a grill site, for fence maintenance, to lay out a trail, to pick up a carcass, or just to see what's over the next hill, driving across the countryside does unacceptable damage. It decreases forage, increases erosion, and leads to trespass problems in addition to spoiling the scenic qualities of the land.

Limiting vehicle use to existing roads is no solution. It's unworkable. Whatever the regulation may be, most people will interpret it to mean just about everywhere, even on game trails. One man's "out" through the Lander Resource becomes the next man's "existing road". Prosecution under an "existing road" regulation would be almost impossible even if BLM employees were to be diligent in enforcing it. Vehicle travel throughout the resource area should be limited to designated routes only. These routes should be clearly marked and all others clearly blocked. Judging from violations I've seen in wilderness areas and other National Forest land, even such stringent measures won't solve the problem completely.

On the same subject, it would be a good idea to set aside an area specifically for OHV use. The machines are on the market and people are buying them. One can assume they will be used and chances are they will be used on public land. It would be worth sacrificing a few hundred acres, preferably in an area already roaded by oilfield or uranium development, in order to forestall an explosion of OHV use and abuse throughout the resource area.

On a related subject, I agree with your conclusions concerning access (p. 14). The public should be afforded legitimate access to all public lands. I regret that I cannot relate the scribbles on Map 3-1) to roads or any top-

ographic maps. Since I can't tell what you plan, let me just say that designated access to Oregon Trail state should be a high priority, to discourage unauthorized access. Access to the edge of the Snake Indians, Lytle Indians, and eastern Copper Mountain would be nice. All roads on Highway Mountain should be closed and converted to trails or rehabilitated. No one needs to drive to the wilderness boundary. Those who are not fit enough to ride a horse should not be driving in those roads either. More effort should be expended in obtaining easements than in maintaining roads. Roads of the quality of the Steadfast Lane are inappropriate in most areas. Of course access is of no use if you don't have a map that shows it clearly.

New utility lines should be restricted to corridors along highways, county roads and existing utility lines. Double lines should be dismantled and rehabilitated. There can be no excuse for utilities on Highway Mountain, the Snake Indians, Sweetwater Fork, Beaver Run, and along the Sweetwater River or Oregon Trail. I hope that Ted Cramer and the Lander State will see the light of new utility lines. Utility lines crossing an otherwise natural and undeveloped landscape cannot be justified by economic reasons. The uncontrolled proliferation of power lines across the American Southwest was a tragedy I hope will never befall again. Pipelines can define the land and destroy scenic values as much as other utilities and should be restricted accordingly. Where possible, utility lines should be constructed so as to minimize their visual impact.

Petroleum and mineral exploration and development should be allowed to the extent that reconstructed surface disturbing activities can be minimized. The no-surface occupancy restriction should be applied to all scenic or environmentally sensitive areas that have less than a high potential for significant petroleum production. A plan of operation should be required for all surface disturbances, not just those greater than 5 acres. Such plans should be approved only if they demonstrate the need for the proposed activity and include provisions for minimizing impacts on scenic, habitat, and cultural resources. Maybe this would prevent the highway trenching that seems to have been prevalent during the uranium exploration era.

Logging should be allowed as long as the sale is profitable (i.e., the smallest cost of timber improvement projects, surveying, marking, administering, clearing up, and reforesting the sale is less than what the buyer pays) and involves no new road construction (existing trails excluded). With the possible exception of Great Smoky, BLM timber should support large scale logging operations and should be managed accordingly. The emphasis should be on firewood, posts, and poles rather than on sawtimber of high value. While salvaging timber is a good idea in theory, it should not be done at a loss to the government. If you can't stand dead trees, burn them. Don't use taxpayers' money to give them away.

Although I enjoy wilderness, I doubt that any area in the Lander Resource area are suited to that classification. The presence of a major highway makes the Copper Mountain area an unlikely wilderness candidate. However, the area could be easily damaged because of the steep topography. New roads and utility lines should be restricted. The no-surface occupancy restriction should only be used if the area south of the 1540 N. contour (Map 1). The complex ecology of the area, its scenic value, and its proximity to Aspen and Little Park suggest that

3. Data on the Pony Express Station you mentioned is inconclusive at this point. One source places a station at Strawberry Creek, but this information is not supported by any other sources we have reviewed. We will continue our information search to answer your questions.

2 The area is most valuable as a recreational resource.

The landscape looks are outstanding features that should be preserved in their natural state. Wilderness designation may not be necessary. Because of the extremely low potential for petroleum or mineral production, the area is reasonably safe from oil leasing and an intrusion activity. Lands surrounding the river should be managed to maintain the scenic qualities and primitive aspects of the area. If highway abuse is introduced, wilderness destruction would be necessary in order to prevent abuse by wheeled hikers/mountaineers. It is interesting that someone to local residents was cited as a reason for not recommending wilderness designation but it did not stop you from recommending the introduction of higher areas.

The partial wilderness alternative recommended for the Twentymile Canyon area is studied. In allowing wheeled access and development to within 1 mile of the river, you will insure that the wilderness won't be wilderness. The area beyond the canyon walls would provide a small buffer zone. If possible, the wilderness boundary could be extended beyond the river. People drive in to wilderness, but they usually don't go far. With the boundary back from the canyon ways, maybe the few trespassers will draw only as far as the edge of the canyon and someone wanting solitude in the canyon might find it. I was out there last year measuring to block the trail into the canyon over the confluence with Strawberry Creek and the stock trail along Strawberry Creek. On my way into the area, I saw no signs and was unsure that I was entering a wilderness. But I did see tire tracks.

As for Kinsey Mountain, its proximity to other wilderness lands suggests that wilderness designation would be appropriate. This designation would also be in the best interests of the higher steep area. Wilderness designation would not affect the petroleum or mineral resources, which are negligible.

Any development in the above lands would be inconsistent with the preservation of the unique natural qualities of the area. Consequently, wilderness designation should be recommended.

Whether or not the area is designated, or even recommended for, wilderness status, the BLM would be wise to make greater use of the ACT administration. I would officially recommend the Copper Mountain area, Twentymile Canyon, Kinsey Mountain, wherever parts of the Twentymile River area, public lands, most especially in the South West area, much of the Beaver River, the Littleton River, the rocky hills in the Granite Mountains as areas of critical environmental concern. I would also recommend protecting areas in the Granite Mountains that have been severely overgrazed and trampled into oblivion but my map lists all of them as unfortunately in private hands.

Castle Gardens certainly qualifies as a wilderness. I encourage you to preserve that fabulous area in a pristine condition. To control vandalism and off-road use, you might consider something like the Forest Service's design and that program. The design would develop the facilities but some gravel in the parking lot would be appropriate.

With regard to cultural/historical sites, the primary concerns should be

3 To prevent deterioration, fences and identifying plaques should be considered for the more notable sites. All sites should be recorded the same protection as the Crown Trail, i.e., no development or disturbance within 1/2 mile of the visible horizon. Any development should be currently under BLM control should also be protected, even lesser known sites on Copper Mountain and Kinsey Mountain. I was surprised the site made no mention of the Pony Express Station where the Crown Trail crosses Strawberry Creek. Perhaps it is an isolated land.

To summarize my view of the resources this area has to offer, I think the recreational opportunities are outstanding. There are developed sites along the highway, at South Pass, and at Castle Gardens. There are the undeveloped cultural/historical sites associated with the pioneers and gold mining. There are the hills and the extreme, the plains and the desert, the wide variety of fascinating geological features, the wildlife, and plant life. There's just being out in the middle of nowhere. I have found greater solitude than hiking in the Granite Mountains than backpacking in some of the so-called wilderness areas in the Wind River Mountains. Your maps J-29, J-30, and J-31 may be technically correct but they are nonsense. They grossly underestimate the area's natural qualities. Hiking across one of the back roads of the Granite Mountains may be "semi-primitive" but it is not to you but it is to me. I like it. I want to be able to still do it 20 years from now.

The Lander Resource area includes lands of extraordinary natural beauty: wide open spaces, mountain plains, wind-swept deserts, rolling hills, granite knobs, fantastically eroded bedrock, and massive sheets of rock dipping off the flank of the old river range. I consider these scenic qualities to be the most precious and important resource of the area. Most precious because it is most easily lost. Most important because without such beauty, the soul withers. In these times when everybody seems so concerned about budgets, economics, cost-benefit analysis, you would be a great disservice by not considering the spiritual values of the lands you control.

My purpose then in writing this letter is to urge you to do your utmost to preserve the natural scenic qualities of the landscape and the widest variety of recreational opportunities. America needs its primitive natural heritage more now than it needs commodities. Undeveloped areas can always be developed. The more heavily developed areas can never be undeveloped. The Burrehead has bigger trees, the Gulf Coast has more oil, nobody needs uranium anymore, and it's more efficient to grow beef in feedlots. It's not saying the above use of public lands should be prohibited but they should take a back seat to the one resource that no place else has: the unique beauty of central Wyoming. Thank you for it.

Sincerely,

George J. Leggett
George J. Leggett



STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE, WYOMING

RE MEMPHIS
OFFICE

February 12, 1986

Mr. Jack Kelly
Lander Resource Area Manager
Bureau of Land Management
P.O. Box 199
Lander, WY 82520

Dear Mr. Kelly:

- 1 The Draft Resource Management Plan/Environmental Impact Statement/Grazing Supplement/Wilderness Supplement for the Lander Resource Area have been circulated for state agency review. Copies of agency comments are enclosed for your consideration and use. You will note that these comments include a number of isolated observations and corrections which should be fully incorporated into the final Lander Area Resource Management Plan. There are also several requests for additional information and further clarification on proposed management directions which should be provided in the final plan.

- 2 In general, it appears that the preferred management alternative presents a reasonable balance between resource production and environmental protection on an area-wide basis. Site-specific concerns and potential impacts, including those voiced in the enclosed agency comments, will obviously have to be addressed in more detail during the activity planning phase. This is particularly true for the increased oil and gas and timbering activities allowed under the preferred management alternative. The potential reductions in general restrictions on oil and gas leasing and development, while desirable from management flexibility and development potential standpoints, will require close consultation and coordination with pertinent state agencies during the proposed case-by-case examinations. The same holds true for the proposed changes in timber management.

- 3 The preferred management alternative recommends the core area of Sweetwater Canyon, about 5,760 acres, as a candidate for wilderness designation. It further recommends that the other wilderness study acreage in the Lander Resource Area, some 42,100 acres, be released for multiple-use management. The rationale for releasing this acreage and the areas involved to multiple-use

Mr. Jack Kelly
February 12, 1986
Page 2

- 3 management appears appropriate. Insofar as the Sweetwater Canyon wilderness recommendation, it appears that there are several viable management alternatives which could preserve the natural attributes of the canyon in lieu of a wilderness designation. As I have indicated in the past, I intend to consider the Sweetwater Canyon recommendation in the context of other Wyoming BLM wilderness area evaluations and recommendations and will formulate a position on the various recommendations when the final statewide picture is available.

Thank you for the opportunity to review and comment on this plan. Please keep me informed of the progress in this effort.

Sincerely,

EH:pcl

Enclosures

cc: Hillary Oden

Response to Letter 562

1. We appreciate the comprehensive reviews and comments provided by the state agencies. Many changes have been made in the final plan as a result. We have also attempted to answer each request for additional information and clarification with the corresponding responses for each point in the reviews.
2. We will continue to coordinate oil and gas actions with the Wyoming State Oil and Gas Conservation Commission, the Game and Fish Department, and the Department of Environmental Quality. Timber management will be coordinated with the latter two State departments in addition to the State Forestry Division.
3. See general response to wilderness comments.

Game and Fish Department

January 10, 1986

ALL MORRIS
DIRECTOR

EIS 2547

USDI/BLM-Rock Springs Dist.
Lander Slope Management
Plan-Draft EIS and
Wilderness/Grazing
SupplementsMr. Warren White
State Planning Coordinator
Berschler Bldg.
Chayenne, WY 82002

Attention: Mr. Paul Cleary

Dear Mr. White:

In response to your notification EIS #138, we have reviewed the documents and offer the following comment and information for use in making the considerations for wildlife in the final EIS more accurate and complete.

The Lander Draft EIS covers most of the wildlife issues identified in early coordination meetings held between the Bureau of Land Management and the Wyoming Game and Fish Department, and incorporates many of the measures previously recommended by this agency to protect or enhance wildlife habitat within the resource area. However, we have found certain errors in the text and tables which we would appreciate having corrected. More importantly, there are also management proposals included in the document that were not preferred alternatives, and which we consider to be inadequate in their present form. There are also some omissions in proposed management direction, and some proposed management directions that need further clarification.

Specific comments are as follows:

Lander Slope and Red Canyon Management Unit

Energy and Minerals

Map 5-1, page 290 appears misleading because it indicates that all oil and gas leases issued in the Lander Slope and Red Canyon Management Units will carry no-surface-occupancy (NSO) stipulations. The text on page 320 states that NSO stipulations will be applied to protect water quality, fisheries, riparian areas, steep slopes, etc. in these two management units but will not be used to protect crucial elk winter range in the two units. It is recommended in the EIS that seasonal stipulations be the sole source

Background: 8400 Babine Riverfront, Cheyenne, Wyoming 82002

Mr. Warren White
January 10, 1986
Page 1 - EIS 2547.

of protection for crucial wildlife habitats. The discussion on page 320 of the EIS indicates the NSO stipulation does not apply to the entire Lander Slope or Red Canyon Management Units, as suggested by Map 5-1. In fact, one of the most important surface resource values in these two units - crucial elk winter range - will not receive any protection from oil and gas exploration and development. Such development could eliminate or seriously reduce that habitat.

Any loss of crucial elk winter range in the Lander Slope or Red Canyon Management Units will have a serious negative impact on both the Lander elk herd and the Lander mule deer herd, because previous extensive subdivision and logging all along the lower edge of the elk winter range, as well as into the heart of the winter range, has reduced the acreage available to wintering elk to the minimum amount needed to maintain current population objectives. Seasonal restrictions will not prevent loss of crucial elk winter range to all and gas exploration and/or development. As a result, these two management units have low potential for oil and gas development. A no-surface-occupancy stipulation would allow limited exploration if interest in the area picks up. More importantly, it should prevent the loss of crucial elk winter range needed to maintain the population objective for the Lander elk herd. Withdrawal of crucial elk winter range from future oil and gas leasing would be even better because of the tenuous nature of the administrative NSO stipulation. As a minimum protection measure, we recommend the NSO stipulation be applied to any oil and gas leases issued on crucial elk winter range in the Lander Slope and Red Canyon Management Units.

Phosphates: The draft EIS also recommends that leasing, prospecting and exploration for phosphates be allowed in the Lander Slope Management Unit (page 320). This recommendation would be detrimental to wildlife for the same reasons explained in the above comments for oil and gas leasing in the Lander Slope Unit. The EIS points out that phosphate reserves occur only in this area and have low development potential. In fact, the last company to hold leases in the area left them expire last year. The potential destruction of crucial winter range as a result of phosphate prospecting and exploration on the Lander Slope is not compatible with the high recreational and wildlife values of the area. We recommend that crucial elk winter range within the Lander Slope Management Unit be withdrawn from phosphate leasing, exploration, and development, as recommended for the Red Canyon Management Unit in the draft EIS.

Forest Management

The forest management discussion on pages 139-151 of the EIS points out that the proposed management direction is to accelerate the rate of cutting of timber to three or four times the sustainable yield of 1 MCF, in order

Response to Letter 563

1. The no-surface-occupancy stipulation would be placed on oil and gas leases issued within the Red Canyon and Lander Slope Management Units to protect certain identified resource values. Based upon existing data and knowledge of the management units, we believe the no-surface-occupancy stipulation will be applied to the majority of the area within the boundaries of these two management units. We believe there is some limited opportunity to explore for and possibly develop the mineral resources within the units without adversely affecting the identified significant surface resources. Until additional mapping and data collection can be performed within these units, we are unable to identify specifically those areas where oil and gas exploration and development would be allowed. Because the majority of the crucial elk winter range coincides with other resource values identified to be protected by no-surface-occupancy stipulations, there is very limited potential for any oil and gas exploration or development to occur within the crucial elk winter range, and then only on a seasonal basis.

2. Prospecting and exploration for phosphates in the Lander Slope Management Unit could be detrimental to wildlife habitats within the unit, if such activities were to occur. However, based on 1) the low development potential of the phosphate reserves, 2) the lack of economic incentive for development for both the present and foreseeable future, and 3) the lack of exploration and development activity that has occurred on valid existing leases over the past 20 years in the unit, there does not appear to be a significant threat to wildlife resources from phosphate exploration or development. In the event exploration or development activities were to be proposed, they would probably be minor in nature and could be adequately controlled through the imposition of the standard protection requirements included in Appendix 2 of the RMP. The requirements in Appendix 2 would prevent any significant disturbance to important wildlife resources within the management unit.

3. The Final EIS has been modified to address your concerns.

4. Maintenance of the elk herd on Green Mountain is one of the highest priorities for the area. The policy concerning roads in forested areas is that any roads used for a timber sale will be kept open one or two years after the termination of the sale to give the firewood cutters time to remove the useable firewood. The road will then be outslipped and waterbarred for drainage and closed to traffic.

Mr. Warren White
January 15, 1986
Page 3 - EIS 2347.

Access:

- 6 We recommend that acquisition of public access be investigated in the Wahsatch Mountain Management Unit, which would allow hunters into the Red Creek portion of the sheep winter range. This access is needed to properly manage wildlife in this section of the county. There presently is little or no public access.

The Red Creek area is an important sheep winter range, yet the cattle and horse allotment (No. 2124) appears to be heavily used, leaving very little forage for highhorn sheep and other wildlife. If livestock grazing practices were changed in this drainage, wildlife habitat would greatly be improved. We suggest better livestock management practices be considered in this area which would improve the range to benefit both livestock and wildlife.

Dubuio Badlands Management Unit

- 7 In the Dubuio Badlands Management Unit, Page 364 - May 29, we suggest the NMO stipulation be extended to the entire area, instead of just that portion designated in the map. The whole area provides important habitat for highhorn sheep, elk, deer, antelope, and other wildlife.

Green Mountain Management Unit

Energy and Minerals:

Areas identified as crucial wildlife habitats in this unit show that there is significant wildlife resource value on those lands, and we recommend seasonal stipulations for oil and gas leases be applied to protect those values. In RMA or areas with high oil/gas potential, we would not object to valuing seasonal stipulations where it is possible for the company to mitigate adverse impacts.

We support the NMO limitation on crucial winter range for the Green Mountain elk herd. We also suggest at least one of the alternatives to the plan should consider limited time-period stipulations in order that seismic exploration would avoid peak recreational periods on Green Mountain.

The decision to require a plan of operations for exploration and development of in-situ minerals on the Green Mountain elk crucial winter range is good. Mitigation of wildlife losses/impacts should be included in the plan. In order to maintain objectives for this elk herd, we recommend the same protection be applied to identified calving habitat.

Mr. Warren White
January 15, 1986
Page 4 - EIS 2347.

Forest Management:

Of three different timber harvest levels considered in Green Mountain, the median level of 3.5 - 4.0 MMBF has been chosen. The actual amount of timber harvested is of less importance to wildlife than the design of the cuts and the means used to access and remove the timber. The idea of compartment development to minimize disturbance is good, but impacts on wildlife will depend on the size of the compartments, the rate of cut, the success of regeneration, the maintenance of adequate thermal and escape cover, and the success of road closures following timber removal. We suggest closures be irregular in shape, less than 35 acres in size, and designed to minimize edge.

Timber harvest by compartments would produce less "edges" than scattering smaller cuts over the entire mountain, but it also would reduce the area affected by human disturbances. Maintenance of adequate foraging areas for elk and deer could be effected by controlled burns in other compartments, to offset the losses in cut compartments.

Landownership Adjustments and Utility Reviews:

In the Green Mountain Management Unit, changing ownership of Tract 1352 would present no wildlife problems if it were treated for some of the smaller adjacent private tracts on the mountain. Tract 135 is accessed by the Green Mountain Loop Road and could be developed for recreational purposes if sold. We would agree to this tract being traced, preferably for land elsewhere on the same road and adjacent to other Red Lake Units as in Sections 27, 29, 30, or 4 of T20S, N34W.

Recreation:

The proposal to maintain existing recreational facilities on Green Mountain, and rehabilitate and maintain disturbed and hazardous areas is a good one and we support it. We recommend the Split Rock and Devil's Gate sites also be maintained.

- 8 Recommended restrictions on ORV use are good. We are glad to see that "hiking on big game hills" is a necessary task that is exempt from the existing restrictions.

We strongly support the recommended search for public access on roads listed in Table 5-2. Access through Red Gap and Wolf Gap roads would be especially beneficial in meeting wildlife objectives. If public access for that portion of the Bison Basin Road from Southwest Station to Bison Basin is not a fact, we suggest obtaining legal access also be considered in this plan.

to all types of such vehicles (see ORV Designations in the Affected Environment).

13. Based on recent experience, we believe that under normal conditions and applying current rehabilitation techniques that we can achieve rehabilitation in the majority of the cases in 3 to 5 years. Many of the failures referred to are old attempts at rehabilitation that were primitive in comparison to the techniques employed today. Additionally, there is far greater emphasis placed on rehabilitation by both the land manager and industry today than there was even 10 to 15 years ago. Granted, the site, in some cases at the end of 5 years, may not support the pre-disturbance vegetation such as sagebrush, timber, etc., but it would be contoured to as near the natural terrain as possible and stabilized with pre-existing native grass and forbs.

14. Thank you. These errors and omissions have been corrected in the Final RMP/EIS.

15. Some water quality measurements (discharge, conductivity, dissolved oxygen, pH, temperature, turbidity, total suspended sediment, TDS, etc.) were taken in the summers of 1980 and 1981.

16. Thank you for your suggestion. We have added this information.

17. The changes you suggest have been made in the Final RMP/EIS.

18. No assumption was made that all habitat types would be restored at a rate of one-third in 60 years. We made a projection that one-third of the amount of wildlife habitat lost would be restored in 60 years. All undisturbed native range is considered wildlife habitat for one species or species group or another, for one reason or another. There is no argument that some vegetation types or communities can be reclaimed or regenerate faster and more easily than others, however, 60 years is a fairly long period. We have observed locally that, at least under some conditions, it is possible to reestablish viable stands of our most predominant vegetation types in this time span. This includes grassland, sagebrush types, mountain shrub types and conifer stands. These types make up the vast majority of the habitat in the Lander Resource Area and in the high potential oil and gas areas. The majority of the habitat losses will occur in high potential oil and gas areas in these general habitat types. Based on observations of a variety of oil and gas related disturbances and developments which are up to 100 years old, we believe our assumption of 33 percent recovery in 60 years, while just an estimate, is reasonable and valid for making impact projections. The continuing analysis on pages

Mr. Warren White
January 10, 1986
Page 7 - 215 2541.

Beaver Creek Management Unit

In the Beaver Creek Management Unit, we suggest tracts 124, 127, and 133 be traded for land that adjoins existing RMP land.

Gas Mills Management Unit

- 9 In the Gas Mills Management Unit, a number of tracts are proposed for sale or exchange. We do have some concerns with several of these tracts, and feel retention in public ownership would benefit both wildlife and public access. Tracts 137 and 138 are isolated from other RMP lands, but within a state section that abuts a solid block of RMP land. These two tracts only appear isolated on the RMP map because they are on the border of the Gas Mills Management Unit (part of tract 137 is actually in the Beaver Creek Management Unit). Tract 139 abuts the Klamath National Wildlife Refuge and we recommend it also be retained in public ownership. If the RMP no longer wants to manage that tract, we suggest a transfer to the Fish and Wildlife Service be evaluated. Tracts 138 and 139 are isolated, but each is accessed by the Turkey Track Road (Hudson County Road 222) and could possibly be traded rather than sold, thereby avoiding in meeting RMP access acquisition objectives in the area.

Fire Management

Whiskey Mountain:

- 10 We feel that full suppression for fire management on Whiskey Mountain is not a preferred alternative. Fire is probably one of the best habitat management tools for improving highburn sheep habitat. We do not feel full suppression of fire to be compatible with the overriding RMP objective for the Whiskey Mountain area: to promote and perpetuate highburn sheep habitat in cooperation with the Wyoming Game and Fish Department, U. S. Forest Service through the 1989 Whiskey Mountain Cooperative Agreement. Pages 130, 136, and 202 contain a very good summary of the benefits of fire to wildlife and habitat. Additional benefits of fire for highburn sheep are the opening up and maintaining the open nature of riparian meadows through conifers, opening up feeding areas that have been grown over by conifers and/or tall brush, providing early spring and late fall grazing that attracts new and increases nutritional level, and aiding summer and winter. The Wyoming Game and Fish, in cooperation with the RMP, has a prescribed burn plan for 1986 to improve sheep habitat. Several other burns are planned for the future in mainly conifer or old burn areas.

We also feel the RMP's preferred alternative for full fire suppression on Whiskey Mountain is contrary to the Blandford Plan: to allow natural fire to occur in the immediately adjacent Fitzpatrick Wilderness to improve highburn sheep habitat. Since the RMP and U.S.F.S. have overriding objectives to improve and maintain sheep habitat through the Whiskey Mountain

Mr. Warren White
January 10, 1986
Page 8 - 215 2541.

- 10 Cooperative Agreement, it seems to us to be counterproductive, and in conflict with that agreement, for the RMP to support full fire suppression in this area. It seems more appropriate to this agency that a cooperative protective agreement for initial attack with the U. S. Forest Service, page 135, should be revised so as to not conflict with the Whiskey Mountain Cooperative Agreement.

In summary, we feel the Whiskey Mountain area should have a very limited fire suppression preferred alternative, especially in the conifer areas. We also feel a cooperative plan should be developed for this area showing specific sites that would benefit from fire, (both natural and prescribed), and allow these areas to burn if public safety, protection of private property, and other resource values are not at issue.

South Pass:

Page 325, it is stated that prescribed burns will be used to enhance certain vegetative types such as sage, willow-riparian, shrubs, and conifers especially for moose habitat. These are very good objectives, however, it is very inconsistent under Fire Management to choose a preferred alternative that supports full fire suppression. We suggest the designation of areas that could benefit from limited or no fire suppression, to accomplish the objectives for wildlife and for prescribed burns. Fire suppression, in many areas, has prevented natural rehabilitation of our aspen stands, willow patches, numerous other shrubs, and conifers to the detriment of wildlife habitat.

Off-Road Vehicles

Dubois Badlands:

We support the preferred alternative to close the entire unit to off-road vehicle (ORV) use. This is compatible with our sheep herd objectives for this area. Excessive ORV use could be very detrimental to the pearling sheep habitat of this area, especially during critical times of lambing and nursing, winter, etc. It would also be very destructive to the fragile soils and vegetation of the area.

Whiskey Mountain:

We support the preferred alternative to limit vehicle use to designated roads and vehicle routes and impose seasonal closures in some areas. We feel local public hearings should be held on proposed road closures, prior to implementation.

189 through 195 of the Draft RMP/EIS adequately stresses the greater importance of crucial habitat loss.

19. Within the behavioral avoidance zones, 50 percent to 100 percent of the habitat value is expected to be lost. In other words, while a behavioral avoidance zone may be established around a disturbance or activity zone, if the activity is only intermittent or sporadic, the habitat value may only be reduced, not totally lost. Using your example, if the disturbance was a producing well site visited only once a week by a pumper in elk summer range, the elk may still make reduced but significant use of the 150 acre site. As discussed in the Thomas reference, a number of factors should be considered including extent of human activity, species involved, time of year, topography, type of habitat, etc., when attempting to determine the extent of behavioral avoidance zones. Since our purpose was to arrive at a reasonable average percent increase in habitat loss as related to the acreage of physical habitat loss, we had to consider a wide range of combinations of the above factors. The 200 percent increase over the physical habitat loss we used is reasonable and defensible for impact projection purposes in this area.
20. Conflicts between seismograph and recreation use are considered at the time a Notice of Intent is filed. Stipulations are attached to the Notice of Intent as required on a case-by-case basis. This is a discretionary action not requiring a RMP decision. The stipulation is already available for administrative use where appropriate.
21. The impacts on hunting depend on the decisions made on a case-by-case basis in a KGS area. Otherwise impacts of the Preferred Alternative (D) would be the same as Alternative A.
22. Appropriate changes have been made in the Final RMP/EIS. Perhaps the seasonal range designation for the winter antelope range in the Lost Creek area should be reexamined and the importance of this range to the Red Desert herd more clearly defined to the benefit of both our agencies.
23. The efforts to restrict woodcutting to desired compartments would be mainly in the form of signs directing people where to go and where not to go. Access to undesirable areas would be restricted, either with gates or dirt berms. An employee travels the mountain in the summertime, including weekends, to monitor firewood cutting.
24. The statement regarding legal access to tract 134 has been corrected. Exchange is the preferred method of disposal for this tract, but exchanges are not always feasible for a variety of reasons.

Specific Comments on the Resource Management Plan and Draft EIS, in Order of
Presentation of the Document:

11. 1. Page 22: Wildlife and Fisheries Program, General, 3rd paragraph: We
are pleased to see that bridges and culverts will be designed and
installed to maintain adequate fish passage. However, bottlenecks and
structures are preferred over the use of culverts.
12. 2. Page 33: Technically, the potential reintroduction of bighorn sheep
into the Sweetwater Basin should be listed under Alternative 4, Existing
Management, because existing managers have agreed to follow the Game and
Fish Land in this matter.
13. 3. Page 35: In the GWP plan, snowmobiles are treated separately from other
ORV (it is essential closures on Green Mountain and the Lander Slope. We
would prefer the plan also specify two other snowmobiling vehicles
(such as snow-shoeders) are to be treated.
14. 4. Page 41 and 42: Table 2-3, 11. Fish and Wildlife: With the exception
of that segment which addresses mineral exploration (top of page 43), we
support Alternative 4 of it - Fish and Wildlife, as it offers the most
potential for fisherman resources. Although we are not entirely in
agreement with any of the segments that address mineral exploration
under the four alternatives in 10 - Fish and Wildlife, fisheries impacts
would probably be fewer with the Preferred Alternative.
5. Page 48: The discussion of the effects of oil and gas development on
the environment suggests that disturbed areas are reclaimed within three
to five years in near original condition. This is accurate only in
those instances where soil and moisture conditions are ideal. On most
disturbed sites it will take well over ten years to see vegetation
reestablished near the original condition. There are several examples
in the Resource area where reclamation attempts have been nearly total
failures. The EIS greatly overstates the ease at which disturbed lands
can be reclaimed. We suggest this portion of the EIS be more realistically
differenced.
6. Page 55: Tables 3-8: There is an error in the fish species listed for
Big and Little Hermit Gulch. Game Fish present in Big Hermit Gulch
should be rainbow and cutthroat trout, while in Little Hermit Gulch,
game fish present should be cutthroat trout rather than rainbow trout.
7. Page 92: Map 3-18, Elk Herd Unit boundaries, has a couple errors on it.
The map incorrectly shows a portion of the Ferris herd unit lying east
of the Backcountry area and north of Wyoming Highway 220. Also,
the line between the Shumard and Steamboat elk herds in the
Sweetwater-Crooks Gap Road, not the Blain Basin Road as shown on the map.

14. 8. Page 56: Map 3-17, Male Deer Herd Unit boundaries are out of date and
do not show current herd unit boundaries for the Sweetwater herd unit.
This will now be herd number 46.
9. Page 100: Map 3-19, Bighorn Sheep Herd Unit boundaries, omit the small
corner of the Ferris herd unit in the southeast corner of the resource
area. The boundary of bighorn sheep Area 22 follows the forest southern
boundary. Above this is Area 84, Mount Peak.
10. Page 101: Map 3-20, Sage Grouse Breeding-Nesting Areas fails to show
the 160/1600 complex for Eagles Nest Reservoir at NE 18, 7236, 8929.
11. Page 108: On Table 3-11, the following correction should be made:
Lander: Approximate 2 of Population in Lander S.A. changed to 950.
Wiggins Park (No. 35) Population objective changed to 4,000.
Kane Spring (No. 36) Population objective changed to 800.
Breakdown (No. 36) Population objective changed to 300.
12. Page 110: Table 3-13, Male Deer Herd Unit Data, needs to be updated to
reflect herd unit changes made when the Sweetwater herd unit was created
from Areas 96 and 97. Figures as presented in this table for the Green
Mountain and Beaver Elk herds are in error (and Green Mountain
should be replaced by "Sweetwater").
13. Page 113: In the leveling paragraph on bighorn sheep habitat require-
ments, the plan states that forbs and grasses are the major diet com-
ponents "from late fall to early summer." This should be "from early
summer to late fall."
14. Page 118: In the section on bald eagle, the plan fails to mention win-
tering bald eagles observed using the lower portions of the Sweetwater
River near Devil's Gate. In addition, a pair of bald eagles are known
to winter on the Wolf River below the town of Sublet and above the
Indian reservation boundary.
15. 15. Page 127: Access, Green Mountain Management Unit, 5th paragraph:
Monitoring stations were established to check on elevation, but only
visual observations were made. And the elevation existing West
Cottonwood Creek was coming from the logging road and the Green Mountain
loop road.
16. 16. Page 131: Under Duhon Area Management Unit, another area that would
benefit from prescribed burning are various timbered stands.
17. Page 133: The discussion on this page of burning recreation in the
resource area points out the importance of big game hunting, but does
not address hunting recreation provided by upland game, game birds, and

25. This error has been corrected in the Final RMP/EIS.

26. These tracts are good examples of isolated parcels of land that are difficult to manage. They are in most cases fenced in with private land and are used for livestock grazing by the adjoining landowner in the same manner as the private lands. The BLM's very limited control over the use of these lands. The BLM's first preference would be to exchange these lands and attempt to consolidate the public landownership to improve the opportunities for resource management including wildlife habitat. Adjoining landowners would have a preference right to purchase the lands if they were sold. If sold, it is probable that the land use could remain the same as it is now, which is primarily livestock grazing and wildlife habitat. This is especially true for tracts 44 and 59 which consist primarily of rugged, remote terrain which is not located near access roads or utilities. Though, it cannot be guaranteed, it does not appear that disposal would result in a land use change and wildlife habitat would remain unchanged.

Tracts 63 and 64 are somewhat different. These tracts are located immediately adjacent to the Red Canyon Retreat subdivision and there could very well be a land use change to rural homesites if the lands were disposed. Wildlife habitat which has already been diminished in the area could further be adversely impacted. For this reason, these two parcels have been changed from a possible disposal to retention as you suggested.

27. These corrections have been made in the Final RMP/EIS. Tracts 158 and 159 have public access.

28. Disposal of these parcels would only be to public agencies or private organizations which would use the lands in a manner consistent with the management objective of the East Fork Elk Winter Range.

29. These errors are corrected in the Final RMP/EIS.

30. The first sentence should have read 14 tracts and the text has been corrected in the Final RMP/EIS.

31. This error has been corrected in the Final RMP/EIS.

32. This has been changed to big game crucial winter ranges in the Final RMP/EIS.

33. See Response 11, above.

34. These omissions have been corrected in the Final RMP/EIS.

35. Map 4-1 did not show land that was recommended for disposal or retention but rather which lands were manageable due to

- 17] waterfowl. The Sweetwater River drainage within the resource area is an important sage grouse hunting area. There has been an average annual harvest of nearly 10,000 sage grouse and an annual average of 5,000 sage grouse hunter recreation days over the past three years in this area. These levels of harvest and recreation days are supported by only one other area in the state. Recreation provided by game birds and waterfowl in the Lander Resource Management Plan is not pointed out in the EIS in conjunction with big game hunting values.
- 18] Page 134: Snowmobiling is not a primary recreational activity on Whiskey Mountain and East Fork, but outdoor education, horseback riding and hiking are.
- 19] Page 137: Table 3-20, Hunter Days. This table is incomplete in that it does not explain how this data is derived. The footnote is also in error. Hunter days are calculated by multiplying the average number of days per hunter by the total number of hunters.
- 20] Page 137: Another important aspect of the Snake Meadows is mule deer habitat.
- 21] Page 137: Recreation. The text stated that 500 head of elk are present on Red Canyon during winter, when the correct figure should be 600 head.
- 22] Page 142: The last paragraph for ORV Designations cites Map 3-32, but this map is well back in the plan on page 179. We suggest it be placed immediately following the first reference. Similarly, the paragraph on access refers to Map 3-33, which is back on page 180. The text states that this map shows BLM and county roads, but it fails to show at least the following county roads:

Natrona No. 321	Dry Creek Road
Natrona No. 322	Turner Ranch Road
Sweetwater No. 22	Nicolai Road
Sweetwater No. 23	Wamsutter-Crooks Gap Road

The map shows some state highways, but omits the Sand Drow and Gas Hills Roads, which are now State Highways 129 and 136. The map also fails to show the route of the Simon Basin Road (SLR 3212) from Simon Basin to US 287.

- 18] Page 147: In this section, it cannot be assumed that all habitat types will be restored at a rate of one-third in 60 years. It is more likely that some habitat types will be easily reclaimed or improved, but that crucial habitats will suffer from a much slower reclamation rate. The generalized assumption in the text appears to be to be misleading.

- 19] Page 148: Is the section on Seasonal Restrictions, while it is true the oil and gas industry is unconcerned by seasonal limitations, we feel many of the problems they experience could be avoided by better planning on the companies' part. It has been our observation that too often, the company waits until their lease is about to expire before expressing any interest in drilling, which compresses the drilling schedule. It appears to us that careful planning, and possible site development in earlier years, could reduce overall drilling time constraints.
- 20] Page 150: Despite the citation of Thomas 1983, the estimate that habitat availability would be 30 to 100 percent greater than actual habitat losses is too conservative. Using a reasonable avoidance range of 400 yards (or less, the actual area of avoidance around a 10 acre disturbance would be over 100 acres, about 15 times actual habitat loss).
- 21] Page 154: The section on oil and gas industry impacts on wildlife does not address illegal leases to poaching. While companies may have rules against such activity, poaching still occurs and will increase as the number of people increases. Poaching of animals such as rabbits, hognose snakes, or moose can have significant impacts on populations.
- 22] Page 162: The section on geophysical exploration correctly states that seismic crews move rapidly, limiting disturbance to recreationalists in most areas to only a day or two. Unfortunately, these few days have often coincided with opening dances or weekends during deer and elk hunting seasons on Green Mountain. Since most of the recreational hunting occurs on those few days, this exploration activity has had significant adverse impacts on hunting quality. Since these hunters are often about in dense terrain, there is potential for injury by seismic blasts, and risk to the seismic workers. One of the plan alternatives should consider additional stipulations on exploration to avoid peak recreational periods.
- 23] Page 204: Table 4-3, Impacts to Recreation. The section on Impacts to Hunting incorrectly states that the impact of Alternative B (Preferred) would be the same as that of Alternative A. If the preferred alternative fails to apply protective stipulations to oil and gas developments as the EIS says, impacts will be the same as Alternative C (generally negative), not A.
- 24] Page 224: Since it is specific with other herd units, we suggest the plan state in the last paragraph that impact on the Green Mountain elk and Sweetwater mule deer herd unit would be significantly impacted, not just that elk and mule deer would be impacted.
- 25] Page 226: The plan is in error when it states that only sage grouse and raptorial would be significantly impacted if the last Green Mountain deposits were developed. These deposits lie in heavily used winter range

available access or whether there was an obvious likelihood that there would be a change in land use if the lands were disposed. The decision, as shown on Map 5-37 and in the text of the Draft RMP/EIS, was to retain the land in sections 17 and 20 of T. 42 N., R. 105 W. (tract 29).

36. These parcels have been identified for disposal. Two Fremont County roads cross these parcels and this public access would be reserved if the lands are disposed. We encourage the WGFD to contact us if they have additional access needs or if they wish to pursue acquisition of one or both of these parcels.

37. Alternative C was designed to evaluate only the effects of reduced livestock grazing levels on the study area. Alternative A proposes to reduce livestock grazing 13 to 19 percent in Improve (I) category allotments as well as constructing the range improvements listed on Table A-8 in Appendix B of the Draft Grazing Supplement. Alternative A provides for forage allocations to be made once the monitoring information indicates a need to adjust various grazing animal use levels on individual allotments.

38. It is anticipated that in the short term (1 to 5 years), the range and habitat conditions would continue to decline where they are currently declining. This would occur only in the short term for Alternative A. However, this deterioration would occur in both the short and long term under Alternative B, Existing Management. We feel Alternative A, in the long term, would be the most favorable to wildlife and wildlife habitat.

39. Any range improvements that would occur under the Proposed Action or alternatives would first be subjected to economic and environmental analyses. Adequate information to determine the economic benefits and environmental consequences would be collected before improvements are constructed. The range improvements listed in Table A-8, Appendix B of the Draft Grazing Supplement, were proposed as a result of consultations with individual livestock operators during the allotment categorization process. They are initial proposals that need further refinement with field inspections and specific project survey and design. The environmental consequences, whether positive, negative, or neutral on wildlife, will be evaluated in environmental assessments with review and consultation with the WGFD as well as other affected parties.

40. BLM policy and regulations require that increases in grazing preference be granted only when the additional forage production is permanently available and the management

- 21 for the Red Desert antelope herd unit. This range is not delineated on the map because the animals are forced out of the area in severe winters. During normal winters this range is of greater value to the herd than that of the delineated crucial winter range. Any developments in this area could also adversely impact seasonal migrations.
31. Page 220: The concluding paragraph for the locatable mineral section fails to mention that mule deer in the Green Mountain Management Unit could also suffer long-term impacts from development.
32. Page 220: Fish and Wildlife Section of the Preferred Alternative fails to mention the possible reintroduction of bighorn sheep into the Sweetwater Rocks as listed in Table 2-6 on page 36.
33. Page 202: Map 5-8, Access. All comments on access map 3-33 on page 180 (referenced on page 142) apply here.
34. Page 201: Forest Management - second paragraph. The plan should be specific about what "reforestation" would be applied to restrict public wood-cutting to the desired compartments. It should also indicate what enforcement would be available to ensure other segments of the mountain were not significantly disturbed by "remnant" woodcutters.
35. Page 210: The statement that tract (3a) (in the Landownership Adjustments section) does not have legal access is incorrect. This tract is bisected by the Green Mountain Loop Road (22N 241). If that tract is removed from public ownership, we recommend it be done only through trade for a similar tract with similar access.
36. Page 211: In the section on Landownership Adjustments, tracts 70 and 71 are both "to be retained" and "considered for sale or exchange." We assume this is a typographical error, as the map shows both are planned for retention in public ownership.
37. Page 222: On Map 3-11, Land tracts 44, 56, 83, and 84 have potential for sale or exchange. The rationale for loss of these tracts (page 222) is that they have no significant public resource value and that there is no legal access to the tracts, although there is no legal access to these tracts, all four have significant public resource value. Tracts 44, 83, and 84 lie within crucial mule deer winter range and tracts 44 and 56 lie within crucial elk winter range. We would recommend that these tracts not be sold or exchanged unless adequate replacement values can be secured.
38. Page 231: Landownership Adjustments. Our maps show tracts 159 and 159 are situated by the Turkey Track Road (Harrison County Road 322). Tract 187 should not be listed here, as it lies in the Beaver Creek Management Unit.

- 27 39. Page 241: The section on access roads fails to mention the Red Gap, Wolf Gap, and Beaver Gap Roads mentioned in the preferred alternative in Table 3-2, page 301.
- 28 40. Page 241: We would be quite concerned with any proposal to remove tracts 24, 25, 26, and 27 from public ownership. We feel that lands within this elk winter range must be used in a manner consistent with the management objectives of the unit.
- 29 41. Page 220: Throughout the plan, the State of Wyoming is used synonymously with the Wyoming Game and Fish Department. These two terms differ greatly in their definitions. The Wyoming Game and Fish Department is charged with the management of all wildlife within the State of Wyoming. The State Land Board's major objective is to maximize revenues on State of Wyoming owned lands. Both the Wyoming Game and Fish Department and the State of Wyoming own lands, but there is a difference in their management purposes.
- 30 42. Page 227: Land Ownership Adjustments and Bivory Systems: Should the first sentence be 13 tracts or 34 tracts? The following paragraph refers to 13 tracts.
- 31 43. Page 225: The section on Harvest Restrictions belongs under heading III., Forest Management, on pages 216-217, not under I. Oil and Gas.
- 32 44. Page 280: Under Alternative C, the short reference "range as Alternative A" should probably be "range as Alternative B," since it has no timber harvest.
- 33 45. Page 406: Item 1) under seasonal restrictions, the preferred alternative should probably state "big game crucial winter ranges" rather than mule deer and antelope crucial winter ranges, in the event some elk, moose, or bighorn sheep crucial winter ranges are defined in the future.
- 34 46. Page 406: As stated for page 39, the existing management alternative (A) should include the Sweetwater Rocks bighorn sheep reintroduction.
47. Page 421: The Wildlife stipulations listed here fail to include protection of elk calving areas from Wolf Gap as specified in the RMP Instruction Memorandum No. WY-45-519 dated March 26, 1985. "Wolf" should follow "bivorying" in the latter part of this section on page 422.

objectives for forage allocation of other grazing animals (wildlife and wild horses) have been met. The increased forage production is verified through monitoring studies prior to the granting of the increase on a permanent basis.

41. A 700 acre crested wheatgrass seeding is proposed on the Devil's Gate Allotment as part of the Sun Stewardship Program. Table A-8 in the Final Grazing Supplement and text will be changed to reflect this seeding project.
42. The BLM has always considered the public land in the Red Creek and Little Red Creek area to have been included in the Whiskey Mountain Management Unit since the co-operative agreement was drawn up in 1969. See Response 2 to Letter 20.
43. Restrictions on livestock grazing under the Wilderness Study Area (WSA) designation would be the same regardless of the allotment category I or C. The inclusion of an allotment in a WSA was not a criterion in determining the category of an allotment. The majority of the public land in allotment no. 2112 (51 percent) is in good condition. The scattered public land pattern in this allotment also precludes designation as an I category allotment because the ability to manage these tracts, other than custodially, is difficult at best.
44. The description of the study area is inaccurate. The text in the Final RMP/EIS has been corrected to reflect an accurate description.
45. Variances from these standards could be approved by the authorized officer after consultation with affected parties. The BLM considers the WGFD as an affected party in any fence project that is proposed on public lands due to the possible adverse impacts on wildlife, particularly big game animals.
46. See Response 40, above.
47. We have changed that sentence in the Final RMP/EIS to read that big game also make important use of the grass type mostly during the spring season.
48. The comment identifies an impact that was not originally considered as significant. However, it will be included as a negative impact in the Final Grazing Supplement.
49. Alternative C was designed to evaluate only the effects of reduced livestock levels. However, intensive grazing systems including rest-rotation, are proposed in Alternative A to provide protection to stream banks and riparian areas as a management action to correct factor 4 where significant problems exist around wetlands, riparian areas, and meadows due to livestock concentration. Alternative A also provides for adjustments

in livestock stocking rates, if monitoring information indicates the need.

50. Thank you. Market conditions have been clarified in this section.

51. See Response 41, above.

52. The model used for estimating regional impacts was not entirely appropriate for the Lander Resource Area. Nonetheless, the magnitude of these particular impacts, when compared to the region's economy, are relatively insignificant. This model is probably within no more than a 5 to 10 percent level of error.

53. See general response to wilderness comments.

35. Map 5-1: Wildlife Habitat/Landownership Adjustments. Shown portions of Sections 17 and 18 in T42N, R10W, an land available for exchange or sale, yet Map 5-37 shows these to be retained. We recommend these lands be retained.

36. Map 5-37: The two parcels of land between Jake's Park and Torrey Creek identified as Tract 23 on Map 5-37, page 359, are listed for potential sale or exchange. These parcels of land are contiguous with the Dubois Fish Hatchery lands and provide access to the state land along the hatchery. We would be interested in evaluating Department control of this land, should it become available.

Grazing Supplement Draft RMP/IS:

37. We agree with the BLM decision to neither analyze nor consider Alternatives D and E. Both are unrealistic and undesirable. Alternatives C - Enhance Watershed and Wildlife Habitat, is the simplistic approach to solving range problems to be taken seriously. A combination of reduced livestock grazing and some of the range improvement in the Proposed Action (Alternative A) would have been an alternative worth evaluating. An alternative like the proposed action, with stocking rates based on forage allocation data, should also have been considered.

38. It is difficult to choose between Alternatives B - Existing Management and the proposed action. Without the proposed improvements in range and grazing systems, we feel portions of the resource area will continue to decline in condition. In most cases, this will not be favorable to wildlife.

39. Not enough detail is given in this DMS to evaluate site-specific impacts of the proposed range improvements. If planners are able to estimate that 18 miles of new range fence will be needed in allotment 159, we feel they should also be able to provide maps showing proposed fence locations. Data in Table A-8 indicate that BLM range plans are well-developed enough to provide site specific plans for most of the affected allotments. Without this information, we agree with the principles behind the proposed management action, but not with the listed projects. Presumably, each of these will be evaluated later in time. Each of the proposed improvements may have positive, negative, or neutral effects on wildlife, depending on site, design, construction, etc.

40. The proposal to increase livestock allocations in M - category allotments when "applicable" is disturbing. We question how the BLM will determine if increases are appropriate. Nearly all range monitoring efforts are to be directed to T - category allotments, and we are concerned that necessary data may not be available for the M - category allotments. Just as downward adjustments in livestock use will require documentation and monitoring data, we should any upward adjustments.

41. If the Proposed Action is adopted, we suggest it be modified to accommodate present and future stewardship programs. The Sun Stewardship program is currently proposing a 700 acre replacement of sagebrush greasewood, in riparian alluvial water range, with crested wheatgrass plantings. That planting lies in this SIS area, but is not mentioned in this document. The proposed project is in the Devil's Gate Allotment (No. 0205), which is a M - category allotment. This acreage of brush control should be added to Table A-8 and to the total acreages mentioned in the text on pages 9 and 33.

Dubois Area:

42. Recently the BLM has incorporated about 2,500 acres of land in the Bad Creek and Little Bad Creek area into the Milky Mountain Bighorn Sheep Management Unit. The Game and Fish, Bureau of Land Management, U. S. Forest Service, and U. S. Fish and Wildlife Service have met and verbally agreed to work up a management plan to enhance bighorn sheep in this area. We suggest allotment #2124 should be changed from M category to T category, which would allow assessment of possible livestock grazing practices in the area, to the benefit of both wildlife and livestock.

43. We feel that the Dubois Redlands Wilderness Study Area (WSA) under allotment #2112 is important enough as wildlife habitat and to its original WSA designation, that it be changed from category C to a T, since there is a large percentage of the area in fair and poor range condition.

General Comments:

We support those efforts of a land management agency, such as the BLM, to improve range and habitat conditions on public lands when a large percentage of a specific allotment is classified in fair or poor range condition. Now that a habitat management plan is being formulated, we also support steps being taken to improve those lands that do not meet certain criteria of adequacy in range condition. The Wyoming Game and Fish Department is interested in proper grazing and proper range condition on public lands. Healthy soils and vegetation are major components that comprise the habitat that wildlife depend upon to survive.

Specific Comments on Grazing Supplement Draft RMP & IS: in Order of Pageing into the Document.

44. Page 1: It appears to us that the description of the Study Area has an error in it. From the southeast corner of the Wind River Indian Reservation it is impossible to follow the Matrone County line. Presumably this means north along the Reservation line to Washoe County.

45. Page 8: Regarding variances from RLM standard fences, we would appreciate the B18 stating that this Department will be consulted prior to issuance of any variances which may impact wildlife values.
46. Pages 11 and 12: The section on actions for M - category allotments implies that all of these allotments would receive increases in livestock use from 10 to 35 percent. Increases of less than 10 percent may be all that is appropriate on some allotments, and others may not deserve increases at all. As with decreases, increases should not be granted unless there is documentation and data supporting the decision.
47. Page 19: The B18 states "Wildlife also use the grass during the spring season". This is too general and inaccurate. Some species of wildlife use grass yearling (such as rodents), while other species may not use it at all. We suspect what is being stressed here is that this vegetation type is used by big game, predominantly in the spring. However, wildlife and big game are not synonymous.
48. Page 20: In the paragraph on implementation of grazing systems and/or fencing, there is no mention of the serious negative impacts to some species of wildlife (i.e. big game) with increased fencing of the public lands. Even B18 Type I and Type II fences, which represent compromises between the needs of big game and the need to control livestock, can affect wildlife.
49. Page 40: Alternative C: We support this alternative as described in the Grazing Supplement, and recommend that intensive livestock management using a rest rotation system be integrated into this alternative to provide increased protection to stream banks and riparian areas.
50. Page 40: In the Recreation section, small tracts of agricultural land are predicted to be sold for summer homesites in the Enhance Recreation and Wildlife Habitat Alternative. While this may be true, this is just as likely to occur in all the other alternatives as well, and will accelerate or decline with land prices and the financial health of the agricultural industry.
51. Page 70: Table A-4, Proposed Range Improvements, does not include the 100 acre proposed created watershed planning on B18 lands in Allotment 0205, Devil's Gate (an M - category allotment).
52. Page 86: We question why Albany County is included as part of the Lander Resource Area's economic region. Natrona County data would seem more applicable.
- Page 88: Same comment as for page 86.

Wilderness Supplement Draft BWP/115:

53. The proposed boundaries for the partial wilderness option appear to us to be unmanageable, and we recommend they follow a black pattern using traditional quarter-section lines. The delineated boundaries would create an island of multiple use BLM land in the northern portion of Section 2, T28N, R34W.
- Wildlife resources in and around the Sweetwater Rocks WSA are unlikely to be affected by either a wilderness designation or the lack of such a designation. Wilderness designation in all or any of these areas would provide long-term protection for the enclosed habitats, benefiting mainly mule deer and bighorn sheep, provided a proposed sheep trespassment occurs. Harsh hunting sites and small portions of crucial antelope winter ranges would also be protected. Considering the areas' low potential for oil and gas, only moderate potential for uranium, and fair potential for jade, it is unlikely that any significant amount of habitat would be lost in the near future. Development of these resources could, however, occur in the distant future and wilderness designation would provide protection.

Wilderness designation would increase the difficulty in developing habitat improvements, particularly water development for bighorn sheep. Such development would still be feasible in wilderness, but there would be greater restrictions on design and construction. Wilderness would pose other restrictions on vehicular access into some of the pockets in the area, affecting deer and antelope hunters, and any future bighorn sheep hunting. It appears to this agency that wilderness designation is not needed in these areas to preserve wildlife and recreational resources and opportunities, but we also feel such a designation would have little adverse effect on wildlife and recreational resources.

Specific Comments on the Wilderness Supplement Draft BWP/115 in Order of Presentation of the Document.

1. Page 7: Sweetwater Canyon WSA (ON 030-101): We support the Proposed Action - Partial Wilderness as this alternative offers protection to the canyon area, yet allows motorized access to the canyon rim, which will facilitate fishermen access to the river.
2. Page 9: Fisheries, 2nd paragraph: We are pleased to see the use of motorized equipment, such as an electrical generator for stocking fish, could be allowed for specific projects. We recommend this statement be retained in the Final Resource Management Plan/RIS.
3. Page 11: Cultural Resources, 3rd paragraph: We recommend a new heading be inserted before this paragraph. This paragraph is the beginning of the brief summation of the management actions rather than part of the Cultural Resources segment.

53

4. Page 18: This section on livestock grazing states that Allotments 1822 and 1823 are in the Gas Hills RWS areas. It is our understanding these two 1 - category allotments were covered in the Green Mountains Grazing R18, and therefore this statement may be in error. This section also fails to mention the Diamond Springs allotment (No. 1509) which abuts the WSAs and is an 1 - category allotment discussed in the Gas Hills R18.
5. Page 23: Information presented on mule deer in the Sweetwater Rocks is out of date. These animals are now managed as part of the Sweetwater herd unit, not the Beaver Run herd unit. The population objective for the herd (years '90 and '97) is 1,000 deer post-season, and the population is below that level as a result of losses in the 1983-84 winter.
6. Page 24: The single sentence on porcupine antelope does not sufficiently describe antelope use of these wilderness study areas. The study areas include pockets of brushland habitat off the rocks, much of which is crucial antelope winter range for the Sweetwater antelope herd.
7. Page 24: We cannot agree with the statement that "No bald eagle nests, roosts, or perches are known to exist within the WSAs," but wintering bald eagles have been observed along the Sweetwater River near Devil's Gate, less than five miles from one WSA. This species may use some of the WSAs.
8. Page 27: "Chukar" is misspelled in the section on Small Crows and Game Birds.

Resource Management Plan (RMP) Draft R18

Proposed Actions

The greatest potential danger to wildlife in this RMP is the recommendation that seasonal stipulations (primarily wildlife stipulations) would not be applied to leases in RWS and areas with high potential for oil and gas unless they are necessary to avoid a significant impact on another resource. The implication is that these seasonal stipulations are often arbitrary and unnecessary. We contend that these stipulations represent a viable compromise to allow oil and gas extraction and exploration without unduly endangering the wildlife resource. Any proposal to abandon the policy of multiple use in these areas to promote a single resource would be of serious concern to this agency.

If this policy is adopted, 32 percent of the crucial winter range for the Green Mountain elk herd (3,000 acres of 11,351 acres) would be unprotected from oil and gas exploration and development. Similarly, 31 percent

53

of the identified calving habitat for this elk herd (1,160 ac./2,796 ac.) would receive no seasonal protection. Within the entire Lander Resource Area, 12 of 76 identified sage grouse leas, over 13 percent of the identified mule deer crucial winter range (6,752 ac./285,433 ac.), and 20 percent of the antelope crucial winter range (110,000 ac./551,148 ac.) would be denied the limited protection afforded by seasonal stipulations.

Since seasonal stipulations on these leases would be considered case by case, wildlife seasonal stipulations may occasionally be applied. In our experience with the Boulder stone leases on Green Mountain, wildlife stipulations were omitted even when, in our opinion, they should have been applied by regulation. We are concerned that fair consideration for wildlife concerns, even on a case by case basis, may not be adequate.

The proposal to use prescribed burns to improve wildlife habitat is a sound one, since this is a good tool for that purpose. Benefits of the burning projects will depend on the sites to be burned, the prescription, and the objectives for each burn.

We support the decision to continue cooperation on the proposed Sweetwater Rocks bighorn sheep reintroduction. An stated earlier, we feel this proposed action more appropriately should have been included in Alternative A, Existing Management.

The decision to improve management by removing small isolated tracts from public ownership is reasonable. From the standpoint of maintaining public access and protecting wildlife habitats, we believe land trades should be the primary means of removing these tracts from public ownership. Direct sale of such tracts produces reduced management costs, but wildlife management and public access are also important considerations.

We recommend that acquisition of public access be considered in the Whiskey Mountain Management Unit to allow hunters into the Red Creek portion of the sheep winter range. This public access is needed to properly manage wildlife in this section of the country. The area presently has little or no such access. The Red Creek area is an important bighorn sheep winter range. Should improved livestock grazing be instituted in this drainage, wildlife habitat would be greatly benefited. We strongly urge better livestock management practices be explored for this area.

Due to the way they are packaged, it is difficult to recommend one alternative. The preferred Alternative appears reasonable, except for what we consider to be a disastrous change in wildlife stipulations on oil and gas leases, and a few minor problems with some proposed changes in land ownership. Alternative C is not desirable because it favors oil and gas and locatable minerals, and limits the bighorn sheep reintroduction into the Sweetwater Rocks. Alternative B would be suitable except for what we consider to be the excessive timber harvest proposed on Green Mountain. Alternative A, Existing Management, should also include the proposed bighorn

Mr. Warren White
January 10, 1986
Page 21 - EIS 2547

53

sheep reintroduction into the Sweetwater Rucke. If this omission were corrected, we recommend selection of Alternative A over the preferred plan, to avoid the loss of wildlife stipulations on permits for oil and gas exploration and development. We also recommend that the authors correlate the alternative presented in the three documents to avoid confusion or misunderstanding.

Please forward these comments to the appropriate Federal agencies and contact this office if we may be of further help.

Sincerely,

Bill Mann
FRANCIS PETERA
ASSISTANT DIRECTOR
OPERATIONS

FF:HEM:mac

cc: Game Div.

Fish Div.

NATS Div.

Re: Page 7 Peterson-3519 Partridge Lane-Cooper, WY 82004

564

THE STATE OF WYOMING



ED HERSCHLER
GOVERNOR

State Engineer's Office

HENRICHLER BUILDING CHEYENNE, WYOMING 82002

January 10, 1986

MEMORANDUM

TO: Paul Cleary, Natural Resources Analyst
State Planning Coordinator's Office

FROM: Louis E. Allen, Water Resources Engineer *LEA*

SUBJECT: State Identifier No. 84-136; Land Resource
Area Management Plan Draft EIS, and Wilderness
Supplement Draft EIS; RLM, 1985.

We have a few comments to offer after review of the three subject EIS's. The draft plan appears to generally reflect good management practices for multiple uses of the Resources Area.

Resource Management Plan (RMP)

1

1. Page 76, Water Rights. Relative to the water rights adjudication in the Big Horn River System, actually the proceedings in Water Division 117 are still continuing and the material in this report is not current. The RLM water uses that were not under State Engineer permits have now been adjudicated by stipulated decree dated February 9, 1983. RCM water rights with State Engineer permits that are adjudicated will be subject to the ongoing review and adjudication process of all remaining State-allocated permits.

2. Pages 76-77, Water Rights. The discussion of the Sweetwater River, tributary of the North Platte River, contains errors and apparent confusion. The North Platte River is not under a Compact between Nebraska and Wyoming. The natural flow of the North Platte River is apportioned among the States of Colorado, Wyoming, and Nebraska under a U.S. Supreme Court Decree (1945) and an Order modifying the Decree (1952). The Sweetwater River would be included under a section limiting storage of water in Wyoming for irrigation on the North Platte River or its tributaries above Pathfinder Reservoir to 19,000 acre-feet.

The limitation of 168,000 acres of land being irrigated, as noted on page 77, is correct. The mentioned "137,000 acres" being irrigated is questionable. We consider the full 168,000 acre limit as being under irrigation in any one year. However, 137,000 acres

Response to Letter 564

1. The appropriate changes have been made.
2. This paragraph was meant to point out a hydrologic fact in the life of a reservoir. The BLM does not build solely for fisheries benefits, although in the interests of multiple-use, fisheries are considered. The fisheries in reservoirs on BLM-administered lands were started and are maintained in cooperation with the Wyoming Game and Fish Department (WGFD). The vast majority of the reservoirs do not support a fishery. Most of the early constructed reservoirs and waterspreaders were actually constructed to be sediment traps and rangeland watershed improvement structures, not fisheries or water for wildlife or livestock.

The Code of Federal Regulations, 40 CFR Part 131.2, designates the purpose of water quality standards: A water quality standard defines the water quality goals of a water body, or portion thereof, by designating the use or uses to be made of the water and by setting criteria necessary to protect the uses. States adopt water quality standards to protect public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act (the Act). "Serve the purposes of the Act"

Paul Cleary
January 16, 1986
Page 2

and 18,000 acre-feet are not additive, as suggested in the paragraph text. Since the limitations on irrigation and on water storage for irrigation are considered to have been reached, to have permits for irrigation or irrigation water storage have been issued for a number of years. The Service does provide for "ordinary and usual" water developments for "domestic, municipal and stock watering purposes and consumption" and, with the proper State Engineer permits, some of these small uses may yet be allowed.

Although this section is titled "Water Rights", there is no mention of State laws requiring State Engineer permits for the diversion, storage, or use of the State's surface or underground waters. The appropriate State Engineer permit must be obtained prior to commencing construction for a proposed water use, and without the permit, no water right can exist.

Grazing Supplement DEIS

3. Page 9, Water Developments. This is an appropriate place to mention that a State Engineer permit is needed prior to commencing construction of a proposed development of the State's water for any purpose. Water developments are mentioned numerous times in subsequent pages and the necessity for the appropriate State Engineer permit for each development, whether of surface water or underground water, needs to be brought out.

4. Page 40, 2nd col., 3rd par. Larger reservoirs for stockwater are suggested so as to include fishery benefits. Assuming a sufficient water supply for the priority date of the reservoir, there may be a problem in the Sweetwater River drainage under the North Platte River for such use. The question would arise over whether this was an "ordinary and usual" use of water for "domestic, municipal and stock watering purposes".

5. Appendix A, Green Mountain Study Area, page 9, 6th par. In this context, we suggest adding "under the appropriate State Engineer permits" following "developed" at the end of the first sentence.

Wilderness Supplement DEIS

6. Summary, pages vii-viii. We concur with the Proposed Action for the Sweetwater Rocks WMA and the Copper Mountain WMA, which is to not designate them as wilderness areas but to manage them

(as defined in sections 101(a)(2) and 303(c) of the Act) means that water quality standards should, wherever attainable, provide water quality for the protection and propagation of fish, shellfish and wildlife and for recreation in and on the water and take into consideration their use and value of public water supplies, propagation of fish, shellfish, and wildlife, recreation in and on the water, and agricultural, industrial, and other purposes including navigation. Also, 40 CFR Part 131.10(a) on the designation of uses states: The classification of the waters of the state must take into consideration the use and value of water for public water supplies, protection and propagation of fish, shellfish and wildlife, recreation in and on the water, agricultural, industrial, and other purposes including navigation.

The U.S. Environmental Protection Agency made the following comment: "... EPA's current water quality standards regulation (40 CFR Part 131) which does not allow the state to remove a designated use by, 1) the use is existing (unless a use requiring more stringent criteria is added), or 2) if the designated use can be attained through required technology controls or best management practices (Part 131.10(h)).

3. The phrase about acquiring, the appropriate State Engineer permits occurs in the revised Water Rights section of the Draft RMP/EIS, Affected Environment and in the Draft Grazing Supplement under a subheading for Water Developments. We feel it has now been adequately addressed and isn't necessary to the section that emphasizes range and watershed monitoring.

4. See general response to wilderness comments.

Paul Cleary
January 16, 1986
Page 3

under multiple-use policies. We appreciate the reduction in size of the Sweetwater Canyon WMA Proposed Action to 5700 acres of the canyon proper proposed for wilderness designation, with release of 3200 acres for multiple-use management. There have been proposals for a tributary diversion of water from the Green River drainage to the North Platte River utilizing the Sweetwater River for conveyance. We would prefer non-wilderness designation for this WMA so that options could be kept open for such water developments.

7. Page 46, continued to page 48. This paragraph refers to six designated National Forest wilderness areas in connection with the 1964 Wilderness Act. Following the passage of the National Wilderness Act of 1964, the Cloud Peak Wilderness Area in the Bighorn Mountains was designated, adding some lands to what was formerly the Cloud Peak Primitive Area. This area should be noted, as it is only a short distance from the Copper Mountain WMA.

The six wilderness areas noted above are referred to again in Appendix V, page 127, 1st col., 2nd par. It seems the document should be brought up-to-date by including the designations of the Bighorn Wilderness Act of 1964, which does not appear to be mentioned anywhere.

Thank you for the opportunity to review these DEIS's. Your referral memorandum is being returned as requested.

LEA/hc

cc: George L. Christopoulos
State Engineer

Gordon V. Prosser
Deputy State Engineer

STATE PLANNING COORDINATOR
TO: STATE PLANNING COORDINATOR
FROM: DRAFT LANDER RESOURCE MANAGEMENT PLAN
SUBJECT: DRAFT LANDER RESOURCE MANAGEMENT PLAN
DATE: NOVEMBER 26, 1985

THE GEOLOGICAL SURVEY OF WYOMING

UNIVERSITY OF WYOMING
1000 UNIVERSITY STATION
LARAMIE, WYOMING 82071
(307) 762-2000 (307) 762-2000

STATE PLANNING COORDINATOR
TO: STATE PLANNING COORDINATOR
FROM: DRAFT LANDER RESOURCE MANAGEMENT PLAN
SUBJECT: DRAFT LANDER RESOURCE MANAGEMENT PLAN
DATE: NOVEMBER 26, 1985

MEMORANDUM

To: State Planning Coordinator
From: Gary S. Gies, State Geologist, and Staff
Geologists, W.D. Hessel, Jay Norris, Rich
Lewy, Ted Nelson, Alan Verburg, Jim Case
Subject: Draft Lander Resource Management Plan
and Wilderness Supplement
Date: November 26, 1985

We have reviewed the Draft Lander Resource Management Plan (RMP) and
Wilderness Supplement and submit the following comments:

RESOURCE MANAGEMENT PLAN (DRAFT)

Page 18, 2nd paragraph. The Lander Resource Area is in a designated coal
production region. The Energy Information Administration (EIA)
designates all areas in the State of Wyoming as being in coal-pro-
ducing District 19 (see EIA's "1983 Coal Production" Report, DOE/EIA-
211(83), published October, 1984). Perhaps the Draft RMP is refer-
ring to the fact that the Lander Resource Area is not in a known
Recoverable Coal Resource Area (KRCRA).

Although no interest was expressed in leasing Federal coal during the
last call for leasing interest, it does not necessarily follow that
this will always be the case.

Chapter III, Affected Environment, p. 57-78. It seems obvious that very
little effort went into this writing. The geologic discussion is
vague and rather poorly written. More specifically, we have tried
to summarize some of the errors, omissions, etc., on a page by page
basis.

Page 27. Absaroke Mountains is misspelled. Geologic "formations" are
incorrectly referred to as geologic "foundations". The geologic
setting of Copper Mountain, the Granite Mountains, and South Pass
are omitted. Yet these areas are extremely important to the overall
mineral potential of the Resource Area. Similar "greenstone belts"
in Africa, Canada, Australia, and South America are enriched in
mineral resources.

State Planning Coordinator

November 26, 1985
Page 2

Page 60, 6th paragraph, second column. The third sentence is repeated
word for word in the 1st paragraph.

Page 60. We commented on the "oil and gas potential rating system" in
January of 1985. Because we feel these earlier comments are still
appropriate, we have attached a copy of those previous comments.

Page 62, Coal section. There has been some interest in coal deposits at
Little Butte and Maple Creek. In addition, the Bureau of Land
Management has done some coal exploration drilling in the Alkali
Flats area in recent years.

Although much of the Wind River Basin has little potential for coal
mining, there are some areas that are attractive for smaller scale
to serve local (industrial, commercial, or domestic) markets. On the
long-term, in situ gasification of deeper coal beds, especially
those near old oil fields, could be developed for use in enhanced
oil recovery methods.

This section should refer to Map 3-5 on page 86, but it doesn't.

Page 63, Phosphate section. "Cowart Creek" should be "Cowart Creek".
Page 65, Map 3-5. This map is extremely generalized, and the distinction
between phosphate areas and geothermal areas is not readily made.

Most are the bases for classifying and delineating the areas of coal
and phosphate resources as shown on this map. Are they based on
geologic formation, depth, thickness, quality, etc.? For example,
nearly the entire Wind River Basin is underlain by coal resources.

Page 67, Table 3-3. The projections in this table may be too optimistic
since they are arrived at by averaging a growth rate using the trends
of 1950-1984. Falling prices and current economic trends have already
caused exploration to drop off, especially in the case of natural gas.

Page 67, section on Phosphate. Phosphorus "peroxide" should be phos-
phorous "peroxide". The reference to "Coffman (1967)" should be
"Coffman and Service (1967)".

Page 68, section on Phosphate, left column. This section refers to in-
creasing severance rates although we know of no actions in this
regard.

Page 68, Uranium section. There is currently only one uranium mill oper-
ating in the Resource Area. "Uranium Trail" should be "Uranium Trail"
Formation. The report does not mention the uranium occurrences at the
Flathead/Proctorian unconformity. The Wasatch and Green River For-
mations are separate formations.

Response to Letter 565

1. Thank you for the suggested text revisions listed throughout your letter. Appropriate changes have been made in the Final EIS. The remainder of our responses address the concerns raised in your letter that were not related to text revisions.
2. The statement that the Lander Resource Area is not within a designated coal production region was not intended to imply that it is not in a Known Recoverable Coal Resource Area (KRCRA). The intent was to show that any future leasing of coal on federal lands within the Wind River Basin and the resource area would be handled by the BLM on an application basis as apposed to the leasing process mandated for designated coal production regions.
3. The coal and phosphate resource areas shown on Map 3-3 were based on the coal classification system of the U.S. Geological Survey. The coal field boundaries were actually based on measured, indicated, and inferred resources for coals greater than 2.5 feet thick, between 0-3,000 feet of cover. The criteria for delineating the phosphate resources were explained in the text. The Classification systems used are from U.S. Geological Survey Circular 891 (1983) and U.S. Geological Survey Circular 831 (1976).
4. To mention each uranium occurrence and to fully describe each with the justice it deserves would require more detail than is necessary for the management alternatives discussed in the RMP/EIS.
5. A discussion of the gold occurrences on the Wind River, Little Wind River, and Popo Agie River were not included in the Draft RMP/EIS as these occurrences are on the Wind River Indian Reservation. The planning document covers BLM-administered lands only. Since most activity, such as claim staking and assessment work, on the Oregon Buttes-Dickie Springs, Wasatch Formation gold placers occurs outside the Lander Resource Area, a discussion of these occurrences would not be beneficial to the management alternatives of this RMP.
6. The Copper Mountain, Lewiston and South Pass tungsten anomalies occur in areas where the public lands are open to prospecting, mineral entry and mining. Consequently, a detailed discussion of these tungsten occurrence areas would not have any significant bearing on the public land use issues of the Lander RMP/EIS.
7. The descriptions of Physiography and Relief were written to develop a basic understanding of the physical geography and the origins of

soils occurring in the Lander Resource Area. The Green Mountains were discussed separately from the Granite Mountains-Sweetwater Rocks because their soils are quite different.

8. Geologic hazards will be considered when developing site-specific activity plans to implement the land use decisions presented in this RMP.
9. The area is not typical of mountains in general (not just Wyoming's mountain ranges). Most mountain foothills are not separated by a long valley from their mountains. In your comment you include the foothills as part of the basin, which is true. Here we state that they are not at the immediate edge of the basin as they commonly are.
10. The Dinwoody and Phosphoria Formations are indeed Paleozoic rocks. These two formations occur on most of the southern Big Horn Mountains that are in the Lander Resource Area.
11. BLM's standard protective measures for cultural resources are used to protect and mitigate impacts to historic mining sites.
12. This sentence should have read, production potential area.
A discussion of the types of oil and gas traps found to date, types to be explored in the future and production formations will not be included in the Final RMP/EIS. We appreciate your concerns that such a discussion was not included in the draft, but we believe a discussion of these items would not have a significant bearing on the outcome of the land use management decisions.
13. Almost all timber stands in the South Pass area show some signs of old gold mining activity. This may be a small percentage of the possible gold mining area, and very few of these old mined areas may be opened again. However, if one of these areas were utilized again, that would make this statement true.
14. The citation for the timespan used for the Tertiary period and Mesozoic era is: Longwell, Chester R. and Flint, Richard F. 1962. Introduction to Physical Geology. John Wiley and Sons, Inc. Second Ed. New York, London.
15. Although Love (1970) was not referenced as often as Tetra Tech (1983) throughout the Geology and Mineralization sections of the Wilderness Supplement, this in no way implies we relied more on one than the other.
16. See general response to wilderness comments.

5

Page 46, Gold section - This section left out discussions on gold resources along the Wind River, Little Wind River, and Popo Ague River. Gold was mined from placer deposits along the Wind River near Silverton at the turn of the century. This section should also include a description of the Clara Fork placer near Dubois.

Although located just outside of the Lander Resource Area, the auriferous boulder conglomerate at Oregon Butte should be included in the discussion of South Pass. According to Love and others (1970), the gold in the auriferous grit of this conglomerate was eroded from the granite-gneiss terrain to the north. The Mescal conglomerate is reported to have a significant gold resource by Love and others.

In the second paragraph, it is stated that all of the mines at South Pass were operated by inexperienced miners, prospectors, and by crooks. This may have been the case for some of the mining ventures, but others like the Taber Grand were operated by experienced miners who previously worked in the Georgetown District of Colorado. South Pass had its share of inexperienced miners and crooks, but probably no more than any other historic district in the western U.S.

In this same paragraph, gold production estimates should be included.

The third paragraph should include a discussion of the Tin Cup and Bringer (Copper Mountain) Districts. In particular, the variety of mineral resources, mineral potential, and historic production at Copper Mountain has been ignored. The Defias Mine in the Copper Mountain District, is one of the more extensive metal mines in Wyoming, but it isn't mentioned. Copper, gold, and silver were produced at Defias.

Gold mineralization in South Pass could be discussed in greater detail in the fourth paragraph. The gold at South Pass occurs in all major mapable units, but is in particular, concentrated in their cores in metagraywacke of the Mescal Delight Formation. Gold is found less often in "quartz" quartz veins, and may potentially occur in stratiform deposits. Gold also occurs in basaltic flows. Also, "Mally (1973)" should be "Hayley and others (1973)".

This section should include a discussion on exploration by major mining companies for gold during the past 5 to 10 years. From reading this document, the reader gets the distinct impression that the metal resources are very small, and only a few "unexplored" prospectors have a potential interest for metals in the Lander Resource Area, which is not the case.

Page 49, Map 3-4 - This map does not show all the mineral localities referred to in the text.

Page 70, Zeolite section - The Wagon Bed (Socorro) Formation ashes are not from the Yellowstone Volcanics (Quaternary). They are from that region, but the writer apparently did not understand the distinction.

There are more theories, including more recent ones, for the formation of zeolites than the Van Houten (1964) reference. F.J. Love's Professional Paper 484-C on the Granite Mountains contains an example, and this report isn't even referenced in the RMP.

"Van Houten" (1964) is misspelled in the last paragraph.

There is also no reference to the existing zeolite production from Arizona, which attests to the fact that zeolites are not in the "infant stage" of development.

In the next to the last paragraph "Hussell" (1978) should be "Hussell" (1978).

6

Page 70, Other Minerals section - Although the value of gravel, crushed stone, etc., may be small on a regional basis, the cumulative value is significant. There is a limestone quarry just south of Dubois, which was not mentioned.

Tungsten, which is an important strategic mineral, should be discussed more fully in this section. Significant tungsten anomalies occur at Copper Mountain, Lewiston, and South Pass. Copper-silver-gold and bed deposits in the Foothills of the Wind River Range should also be included in this discussion.

7

Page 70, Physiography section - The term "Shoshone Mountains" is no longer used for the area between the Owl Creek Mountains and the Absarokas. Shoshone Range is now used (see Love and Christiansen, 1965 - Geologic Map of Wyoming, sheet 21). Similarly, the Bringer Mountains are generally thought to be simply a part of the Owl Creek Mountains. The Green Mountains and Sweetwater Arch are generally considered to be part of the Granite Mountains uplift. A more modern description of the Physiography is given in Thornberry, W.D., 1980, Regional Geomorphology of the United States. John Wiley & Sons, Inc., p. 11, Chapter 11.

The term "Wyoming Basin" generally refers to all the basins and uplifts between the Southern and Middle Rocky Mountains, not just the features described in this RMP.

7

Thornbury spells "Shoshone" Basin, "Shoshone" Basin, and describes it as the eastern part of the Wind River Basin. Also, there is no mention of the structurally important Casper Arch on the east margin of the Shoshone Basin. On line 7 of the last paragraph (right column), "Mountains" should be capitalized after Wind River.

Page 71, Map 3-5 - Minuslally, "Wyoming Basin" should be deleted from this map.

8

Page 70 and following pages - This section or the previous section of the WOP should include some mention of geological hazards. There are numerous known or suspected active faults in the southern and southeastern part of the Shoshone area. There has also been historic seismic activity in the area. Refer to U.S. Geological Survey Open-File Report 75-279 - Known and Suspected Active Faults in Wyoming; Geological Survey of Wyoming Open File Report 84-11 - Final Preliminary map of earthquake epicenters in Wyoming; and, U.S. Geological Survey Open-File Report 84-1333 on maximum horizontal accelerations expected in the area.

There are numerous landslides and landslide-prone areas, shrinking and swelling clays, compressible soils, and selenium-rich areas that were not mentioned as occurring in the Resource Area. In the latter case, refer to Geological Survey of Wyoming's Open File Report 83-14.

9

Page 77, 2nd paragraph, left column - It is not clear what is meant by "the area is not typical because the foothills occur in the basin, away from the mountain front". Most "foothills" adjacent to Wyoming mountains are in the adjacent basins.

The description of relief in the rest of the paragraph is confusing--most readers will not understand any of this, especially the last part about most of the valley being stripped away.

Page 77, 3rd and 4th paragraphs, left column - The rocks in the Absaroka are better described as "volcanically-derived sedimentary rocks" or "volcaniclastic rocks" than "layers of magma". The Shoshone Mountains are not simply made up of the Virgins Formation. The Washakie Range (Shoshone Mountains of the WOP) is a partially exhumed, granite-cored uplift of Paleozoic and Mesozoic rocks. The Niagara Formation is part of the volcanic pile that once completely buried the Washakie Range.

10

Page 77, 5th and 6th paragraphs - "Mountains" should be capitalized in the fifth line; the Dinwoody and Phosphoria Formations are Paleozoic rocks, not Mesozoic rocks; and, there is a fair amount of Paleozoic as well as Mesozoic rock exposed on the southern end of the Eighteen Mountains.

Page 77, 7th paragraph - The Battlement Hills (Mountains of the WOP) are better described as a Precambrian-cored anticline with uplifted Paleozoic and Mesozoic rocks on its flanks. These rocks have been intruded by volcanic rocks, including lacoliths, sills, plugs, volcanic dikes, etc. In fact, only a small portion of the Battlement Hills is composed of volcanic rocks.

Page 77, 8th paragraph - The White River Formation that occurs on the northern foothills of the Green Mountains has never been subdivided in that area. The Crook Mountains, which lie between the Green Mountains to the east and the southeastern Wind River Range to the west, are not mentioned or shown on Map 3-5.

Page 77, 9th paragraph - The current idea on the origin of the Granite Mountains (see Love, J.-B., 1970, U.S. Geological Survey Professional Paper 496-C) is that the Precambrian core of the range was buried by deposition of Eocene, Oligocene, Miocene, and younger rocks before the range subsided in probably Pliocene time. The granitic knobs were exposed by regional epirogenic uplift that affected not just this area, but the entire Rocky Mountain region. The Granite Mountains preserve a depositional remnant of previously more extensive deposits.

Page 157, South Pass Mining Area - The first paragraph mentions that "South Pass yielded well over a million dollars in gold during its history". This does not give any real indication of value - was this 1860 prices, 1918 prices, or present prices? A better statement would be - "At today's prices (\$325 per ounce), South Pass may have yielded as much as \$106,000,000 in gold".

The discussion of recurrent gold activities in the 2nd paragraph left out the discovery of the Lawrence District in 1870.

Page 158, 4th paragraph - A large amount of the interest in gold at South Pass has been by major mining companies in addition to prospectors.

11

Page 158, 5th paragraph - This paragraph should include a discussion of the Wyoming Department of Environmental Quality's proposed plans to reclaim some of the abandoned mines in this area. This reclamation will have an effect on the historic sites.

Page 166, Riverton section - The report calls U.S. Highway 26, Wyoming State Highway 26.

12

Page 160, Oil and Gas section, last sentence - What is meant by the terms "oil production potential"?

Overall the report could use a discussion of the types of oil and gas traps found to date, and the types of traps which will be explored

12

for in the future, i.e., future exploration will be for deep stratigraphic and structural/stratigraphic traps. Also, there is no mention of the major oil and gas-producing formations in the area.

Page 166, Uranium section - The current uranium production from the Resource Area is all contracted to Japanese utilities, not domestic buyers. Additional production will depend on new contracts being signed.

Page 172, Phosphate section - Regional phosphate production will increase more than stated due to the addition of Chevron's fertilizer plant in the Rock Springs area.

Page 172, Bentonite section - This discussion of bentonite is not adequately related to the Resource Area.

Page 174, Zeolite section - Employment and "income" levels for zeolite mining should be available from the Arizona Geological Survey, for comparison.

Page 181 - The RMP should discuss how they plan to handle requests for coal exploration and development, should they occur.

Section on Environmental Consequences, beginning on page 187 - This section seems to have emphasized the negative consequences of mineral exploration and mining and has not pointed out any possibly positive consequences or the temporary nature of mining activities.

Earlier on page 195, the RMP stated that the effects that the mining industry has had on the fish and wildlife populations is "not well documented". If the effects are not well documented, how can the effects be so negative?

Page 226, Locatable Minerals - Adverse Impacts - This section goes into great detail about the adverse impacts of mineral exploration and mining, but does not discuss the adverse impacts that BLM's limitations on mining and exploration activities might have on mineral activities and potential mineral development in this part of the State.

Page 237, Management Actions for Cultural/Natural History - This section should discuss the Wyoming Department of Environmental Quality's plans for abandoned mined land reclamation in the South Pass, Lewis-ton, Copper Mountain, and Tin Cup Districts.

13

Page 278, Forestry Impact Number 1 - This statement is not true for the South Pass gold mining area. The principal gold deposits do not occur in timbered area.

Page 280, Locatable Minerals, 1st paragraph - This section could use a discussion on what the "plan of operation" involves or does not involve. For instance, what is required in the "plan"? What type of exploration can be pursued without such a "plan"? If exploration is not allowed without first having a plan of operations, this could greatly affect the potential for discovering any gold deposits.

Page 292, Map 5-2 - Like most maps in this RMP, this map does not have any township and range grid to help a reviewer or user locate things.

Page 326, Locatable Minerals section - Potential mining in the Lander Slope area is probably limited to limestone aggregate, which has a low possibility for development. There are parts of the area, however, that could be mined without affecting the aesthetics of the Lander Slope area.

Page 328, Phosphate section - This section is referring to "resources" not "reserves" of phosphate.

Page 329, Locatable Minerals section - Requiring "plans of operations" in the South Pass District could have a severe impact on mining and exploration in this area, depending on the requirements.

Page 341 - "No surface occupancy" restrictions for locatable minerals will essentially close this area to non-oil and gas mineral development. Although it is unclear if this restriction only refers to oil and gas, it would seem like the BLM would have to impose the same restrictions on all mineral activity.

Page 350, Locatable Minerals - This section should include a discussion of the Clarke Fork gold placers.

Page 440, Glossary - "Oreais" is misspelled.

Page 442, Glossary - What is the citation for the timespan used for the Mesozoic?

Page 442, Glossary - What is the citation for the timespan used for the Tertiary?

Page 446, References - Although the University of Wyoming's Institute for Policy Research (1981) was cited for some material in the text (pages 172-174), their publication is not cited in the "References". Also, the material cited as IPW was prepared for IPW by our agency.

14

Page 44, Huesel and Holger citation - "uplift" is misspelled. Also, it should be "Hause, R.O.", not "Huesel, D.K."

WILDERNESS SUPPLEMENT (DRAFT)

Page 31, 1st paragraph, left column, last sentence - Before a deposit can be mined, it has to be discovered. Only after a gold deposit is discovered and its reserves drilled out, does the gold price come into play. There are several gold mines presently being developed around the world (at \$125 an ounce) that were not mined at \$700 an ounce simply because they were not discovered early enough to take advantage of the \$700 per ounce price. In fact, the percentage of gold mines operating at \$700 per ounce were quite small compared to mines operating at today's prices.

One of the more significant gold discoveries this century was made in an area that had been prospected more than 100 years, yet the first gold wasn't produced until gold fell to \$200 an ounce. This is the Huron discovery in Ontario that lies adjacent to the Trans-Canada Highway (Engineering and Mining Journal, Sept. 1965).

Page 31, 2nd paragraph, left column - Although Tetra Tech's assessment of uranium at the Gabbrius-Vredefort contact is low, the anomaly is important and may guide some future exploration.

Page 31, left column, last paragraph, last sentence - This last sentence is an unsupported statement.

15 Page 31, 3d, etc. - The reliance on NURE studies (the Tetra Tech reference) for geology and mineralization potential is questionable. More reliance should be given to Loe (1970), although portions of the NURE's text suggest that the authors may not have understood it.

Page 47, 4th paragraph, right column - Since there was jade mined in the Sweetwater Rocks area in recent years, we fail to see how there could only be a low to moderate favorability for its occurrence. We would call the occurrence of jade, a certainty.

Page 42, paragraph 6 - Zeolites have been found in the Moonstone Formation in this area.

Page 47, paragraph 7 - We have shown occurrences of gold, silver, and other minerals in or near this WSA (see Geological Survey of Wyoming Map Series MS-14, 1965).

Page 48, Geology and Mineralization - This discussion does not mention the Precambrian rocks exposed in this WSA. There are also much better references to the geology of this area than Tetra Tech (1963), which is a NURE study.

There are also numerous errors in capitalization in this discussion, and the Tensleep Sandstone is misspelled.

Page 50, Mineralization section - Precambrian rocks to the east of the WSA host a variety of mineral resources, including iron, copper, gold, silver, tungsten, feldspar, tantalum, beryl, rare earth elements, and lithium. Several mines were developed for many of these commodities. In particular, there has been production of feldspar within the past ten years; some gold was mined from the Gold Nugget region; and, gold, silver, and copper were mined at Buford.

16 Page 51, and 73 - If taken literally, these discussions of the ELM's rules for wilderness exploration disallow any "geologic studies" except for observations conducted after filing an approved plan. Does this restriction include academic studies of the geology, or does the ELM just mean drilling, etc.?

Pages 119 and 120, Appendix III - Although the title of this Appendix is "Geologic Time and Formations", there are no formations listed. The chart on page 120 is confusing in regard to Era and Period boundaries; the Ordovician Period is missing; the units present in the Wind River Basin are not mentioned in such; and, there is no citation to where the listed ages come from. In regard to this latter comment, the age estimates do not agree with those adopted in 1963 by the Geologic Names Committee of the U.S. Geological Survey.

STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE, WYOMING

BY MEMORANDUM
GOVERNOR

TO: Paul Cleary
FROM: Rod Miller G44
DATE: December 3, 1985
SUBJECT: Comments, Lander Grazing EIS, RMP

I have the following comments on the Gas Hills Grazing Supplement to the Lander RMP:

1. Management Actions for Category I allotments, page 11, paragraph 1. Total exclusion of large grazing animals for several years might be necessary on some riparian areas to allow them to recover. This statement raises a question as to whether or not "large grazing animals" includes big game species. Beyond that, riparian zone management is an emerging science and such attention should be paid to ongoing research in Wyoming and other western states before specific management actions are instituted.
2. Socioeconomics, page 24. It is indicated that this information was developed based on a 1979 Bureau of Land Management survey, updated to reflect current prices and costs. However, the graphs on pages 24-28 are based on a 1981 source. My question is, how current is the information presented in the EIS and does it accurately reflect the financial state of the ranch today? The ranch budget information in Table 3-1 on page 24 appears difficult to reconcile with current statistics regarding increasing fuelwood and farm credit problems. It is crucial to have up to date ranch budget information to analyze the socioeconomic impacts of proposed adjustments in stocking rates, seasons of use and other management actions.
3. Environmental Consequences, Alternative B, page 34, paragraph 3. This section supposes that "total exclusion of livestock might be necessary for several years to allow regeneration of the woody vegetative component..." along riparian zones. Again, the question arises: does this enclosure also include big game species? University of Wyoming research along

Paul Cleary - December 3, 1985 - Page 2

3. Muddy Creek in Carbon County is attempting to identify and quantify wildlife impacts to riparian zones. This research should be monitored to determine if gains from livestock enclosure in riparian areas are lost via wildlife use. If this is the case, then BLM should "adjust stocking levels of grazing animals..." and wildlife increases or decreases might be proposed to the Wyoming Game and Fish Department." page 11, paragraph 2.
 4. Page 34, paragraph 3. "Adjustment of turnout dates could help increase forage availability for big game during early spring." Some analysis is needed to indicate whether or not increased big game use of deferred areas would negate benefits to the range associated with livestock deferral.
 5. Finally, the Alternative A proposes reductions in livestock stocking rates of from 13 to 19 percent in 2 category allotments. Detailed resource data is lacking in this document to make a judgment regarding the advisability of this proposal, however severe reductions such as this may prove disastrous to ranching units in the study area. Updated ranch budget information will be necessary to determine if this will be the case. Additional thought should be given to a scheme of management actions that will accomplish desired resource goals without severe adverse impacts to the agriculture economy of the area.
- Such a plan might include monitoring to determine needed actions and then scheduling those activities first that do not reduce cash flow on affected enterprises. If reductions on an allotment are necessary and inevitable, every attempt should be made to mitigate the economic impacts, possibly by making available forage on a temporary, non-renewable permit basis or other feasible alternatives.

tn

1. This management action relates to all large grazing animals including big game species. Research information is currently available to document the effects of livestock, primarily cattle concentrating on riparian areas and the effects of exclusion of livestock grazing on riparian areas. Riparian zone management is receiving more and more attention and ongoing research in Wyoming and other western states and will continue to be used to guide our specific management actions.
2. The economic analysis in the Lander Final RMP/EIS was based on the most current data available at the time of document preparation. The 1979 Survey was adjusted to 1983 prices. The purpose of the analysis in the EIS was to provide an estimate of impacts on individual operators by looking at three model, or typical ranch sizes. This type of analysis provides the reader with a general idea of what the impacts could be on an individual livestock operation by comparing the size of an operation to one of the three model ranches. This type of an analysis does not provide a precise description of the livestock industry as a whole. This is because there is more variation in the sizes of the operations, as well as their methods of operating, than is represented by the three ranch sizes presented in this analysis. We consider the economic impacts of our actions on an individual operator before those actions are taken. This will be accomplished through implementing our rangeland management policy, where we will gather site-specific data and work closely with the affected operator before taking any actions.
3. The Rawlins District, BLM, is currently participating in and funding a portion of the research project on Muddy Creek. We are monitoring this research project closely.
4. An analysis of the estimated forage consumption by kind of grazing animal was completed by BLM in May, 1983, for the Green Mountain EIS Area. At this time, big game animals (elk, moose, mule deer, and pronghorn antelope) were using 5 percent of the total forage consumption for the EIS area. Wild horses were using 13 percent and domestic livestock (primarily cattle) were using the remaining 82 percent of the total forage consumption. On some small isolated areas of crucial elk winter and spring range, the benefits received from livestock deferment may be negated. However, it is estimated that this situation would occur on less than 1 percent of the total resource area under BLM administration.
5. See Response 2, above.



WYOMING RECREATION COMMISSION

122 WEST 25TH - HERSCHEL BLVD. CHEYENNE WYOMING 82002

ALVIN E. RICHMOND, F.S.
CHAIRMAN
P.O. BOX 100
CITY CENTER

January 21, 1986

Mr. Warren White
State Planning Coordinator
Wyoming State Clearinghouse
Herschel Building
Cheyenne, Wyoming 82002

RE: 84-138

Dear Mr. White:

The Wyoming Recreation Commission (WRC) received the Bureau of Reclamation's Draft Environmental Impact Statement for the Lander Resource Area Management Plan on November 21, 1985. Thank you for the opportunity to provide input into this important review process.

The following comments and concerns represent a synthesis of agency reaction to the Bureau of Reclamation's Draft Environmental Impact Statement for the Lander Resource Area Management Plan on November 21, 1985. Thank you for the opportunity to provide input into this important review process.

The RMP clearly demonstrates that the BLM is concerned with recreation management and historic preservation within the Lander Resource Area. This is particularly true in regard to the South Pass Historic Mining District. (As you know, the BLM currently administers South Pass City Historic Site.) Recreation and gold mining are the primary activities in the South Pass Historic Mining District. In 1985 more than 20,000 people visited this area, primarily to enjoy the historic sites and to camp and hike. Also, this area is still the most active gold mining region in Wyoming. Hunting for gold even occurs in South Pass City during the summer. The BLM recognizes these important activities by devising a balanced plan that would preserve the cultural resource while allowing small gold mining operations to continue.

We strongly concur with the stipulation in the RMP that requires plans of operations for all proposed mining operations within the historic district. By requiring this plan, the BLM will ensure that mining will not destroy important historical and archeological remains. This policy is the cornerstone of balancing mining and recreation in the same area. Without it, miners from outside the local communities could destroy historical sites, impact air operations at South Pass City, and significantly curtail the recreational potential of this area.

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Page -2-

We also agree with the BLM that the federal agency should continue the present mineral segregations in the historic district, especially those in Sections 20 and 21, T29, R20E, around the Corrie Shaded mine, and in Willow Creek canyon from South Pass City to the Corrie Shaded mine. These segregations will not only protect significant sites, but will also retain the visual integrity around the South Pass City historical area.

We also applaud the BLM's desire to manage the historic district "... toward maintaining recreational opportunities in terms of rustic, open space settings" (p. 322). South Pass City should be included in the list of sites to receive this intensive management. We also agree with the RMP's provisions to limit OHV use on existing roads, to utilize full fire suppression in the entire area, and that existing roads provide adequate access to the district. The BLM should also be commended for its recognition of and conformance to the local zoning ordinance in South Pass City.

In spite of these positive aspects, the RMP raises some concerns. First, in order to prevent any destruction of historical remains from oil and gas activities, the BLM proposes to place "The Surface Management Plan" stipulations on all future oil and gas leases within the South Pass Historic Mining District. No leases exist at present, primarily because there is low to no potential for oil and gas in this area (p. 329). While we agree that oil and gas activities would significantly impact Wyoming's largest historic site, issuing leases with NSO provisions may not adequately protect South Pass City or the historic area, which contains more historic remains per acre than any other place in the state. The legitimacy of the NSO stipulation of the BLM is questionable. The BLM agency company representatives believe that NSOs would prevent them from developing their lease, especially if they could not access the property by backdrilling. If a court challenge of an NSO in the country were successful, then oil and gas drilling could occur anywhere in the historic district, including South Pass City.

Also, NSO provisions are a management decision made by the BLM. The agency could drop these stipulations in the future. Thus, NSOs do not offer permanent protection, no matter how good the BLM's intentions are at present.

As a result of these problems, the BLM should issue oil and gas leases with NSO stipulations only on those areas within the South Pass Historic Mining District that the agency is positive can be reached by angle drilling from rigs outside of this area. The remaining portion of the district should be withdrawn from mineral entry as is being proposed for the land adjacent to Silver Canyon State Park. This is the only way to insure the continued preservation of historic sites, the retention of the area's "rustic, open space setting", and the high recreational opportunities.

Second, the RMP fails to address the chronic problem of grazing within the South Pass City Historic Site. In the past few years, as many as twenty cows have grazed around the historic structures. This has caused stream bank erosion, overgrazing, insect problems in the historic area, and the loss of historic health and safety. The BLM needs to correct this situation as soon as possible. Better livestock management by the rancher would be a short-term solution, especially if the cowboys would occasionally drive the cattle down Willow Creek for several miles. In the long run, the BLM should install a fence and some cattle guards around the town.

Response to Letter 570

1. The RMP did not suggest South Pass City to be an area of intensive management because of the following reasons: 1) The State of Wyoming has leased historic South Pass City lands from BLM, and is already intensively managing these lands. 2) BLM-administered lands surrounding the historic townsites possess intact natural and historic settings at the present.

2. See Response 1 to Letter 15. It is our belief that no-surface-occupancy (NSO) stipulations are enforceable and would provide the protection necessary to prevent any disturbance from oil and gas exploration activities within the South Pass Historic Mining District. We agree that the NSO stipulations do not carry the same degree of permanency as a withdrawal in that they contain a provision for waiver. But, as Bureau policy states: "waiver of an NSO stipulation would be subject to the same test used to justify the imposition of a stipulation in the first place: that is, if an NSO stipulation is justified and used because a less restrictive stipulation would not adequately protect the public interest, then a waiver of an NSO stipulation could only be granted where it can be shown that because conditions, uses, etc., have changed, a less restrictive stipulation would protect the public interest." (Washington Office Instruction Memorandum No. 84-252, Change 2).

Additionally, the Instruction Memo cited above also states: "Also, a no lease decision should not be made solely because it appears that directional drilling would not be feasible, especially where an NSO lease may be acceptable, for whatever reasons, to a potential lessee. In such cases, the opportunity to accept or refuse an NSO lease would be left to the potential lessee."

3. Wyoming has always been an open range state in the sense that the owner of cattle or horses is not required to confine them or prevent them from straying or wandering upon the unenclosed premises of another person. According to the Wyoming "open range law," it is the landowners responsibility to fence out unwanted livestock.

The Wyoming Recreation Commission (WRC) currently leases the public land within South Pass City from BLM through a Recreation and Public Purpose (R&PP) lease. We anticipate that within 2 years ownership of this public land will pass to the WRC.

4. The Lander Resource Area is currently devising a draft management plan for the proposed South Pass Historic Mining District.

- 4 Third, the RMP indicates on page 332 that the "patrolling and monitoring of sites in the [historic district] would deter destruction of historical sites by vandals." We agree, but the BLM does not indicate if the federal agency plans to do this and how often.
- 5 Also, the RMP does not offer many details on the BLM's plans for Miners Delight. We would be willing to assist the Bureau in interpreting this town.
- 6 The WIC is generally pleased with the way the BLM is proposing to handle access problems within the resource area. In developing the 1993 State Comprehensive Outdoor Recreation Plan (SCORP) for Wyoming, the WIC has identified access as a major recreation issue of statewide significance. Although it is stated in the RMP that recreation access is being restricted by private landowners in certain areas, limited funds for recreation will prohibit both extensive access acquisition and continued road maintenance (p.242). In light of this situation, the BLM should consider working with the Wyoming Recreation Commission, the Wyoming Game and Fish Department, and other related agencies and organizations on developing cooperative programs to improve recreation access in the resource area.
- 7 For the most part, the RMP adequately addresses most trail management concerns within the resource area. However, documentation of trail history in the RMP is somewhat weak. For example, the RMP does not discuss the west to east movement of people and animals (i.e., Horems, cattle, etc.) that occurred within the area. Further, no mention was made of the trail cut-offs in the area or other trails that used the Oregon/Mormon Trail corridor, such as the California Trail or Pony Express.
- 8 The preferred alternative for the Castle Gardens Management Unit which includes the development of an Oregon/Mormon Trail Management Plan as described in Chapter 3 is very desirable. However, the suggestions about development at the Castle Gardens rock art site should include the stipulation that a full-time employee be at the site in order to protect it from vandalism. (This is the restriction that was put on us by the Morland BLM Office as a condition of developing the Legend Rock site.)
- Finally, the Preferred Alternative for the Beaver Creek Management Unit suggests bringing Burnt Ranch into the public domain. Just a reminder that BLM has a signed Memorandum of Agreement with our agency that any contact made with private property owners regarding Oregon/Mormon Trail historic resources will be made through us first.

In summary, the BLM's desire to protect recreational and cultural resources is evident in the RMP. As long as the concerns and issues raised in this letter are adequately addressed through the review process, the Wyoming Recreation Commission would be in support of the Preferred Alternative.

If you have any questions regarding this review, please feel free to contact this office.

Sincerely,

Oliver J. Easton
Oliver J. Easton, P.E.
Director

AFB:MF:lcl

- We will detail our recommendations for patrolling in the District in this plan. We will solicit comments from interested parties within the next year on the best approaches to patrolling of sensitive sites in the District.
5. We welcome your offer of assistance in interpreting Miners Delight townsite. Our recommendations for managing this historic townsite will also be included in our draft management plan for the South Pass Historic Mining District, which will be available for comment by interested parties.
6. We appreciate your offer to work cooperatively on programs to improve recreation access. Several options could be pursued to mutual benefit such as recreation land use agreements, operation respect/hunter access, and cooperative management agreements (CMAs) for fishing access.
7. The reason the Draft RMP/EIS only lightly covered the history of the Oregon/Mormon Pioneer Trail was because we felt we needed to only address the highlights of the trails' history for the purpose of the RMP. The BLM Oregon/Mormon Pioneer National Historic Trails Management Plan, referred to often in the Environmental Consequences and Preferred Alternative Chapters, contains in-depth historical documentation of the two trails.
- As to the California and Pony Express Trails, we have added a short discussion of those two trails. However, because the California and Pony Express Trails follow the same route as the Oregon/Mormon Pioneer Trail, they will be protected and managed under the Oregon/Mormon Pioneer Trail Management Plan. We felt that a discussion of the two established National Historic Trails in the Lander Resource Area was sufficient.
8. BLM does not have the funding at this time to have an employee at the Castle Gardens site on a full-time basis. Instead we are planning to have BLM cultural resource personnel regularly patrol the site, as well as having any BLM personnel who are in the area visit the site, to deter vandalism. We are also pursuing the possibility of having volunteers at the site on a semi-permanent basis.

JAN 24 1986

ED HERSCHLER
GOVERNOR

Public Service Commission

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WILLIAM L. JOHNSON
DISTRICT RATE AND TAXES

MEMORANDUM

TO: Mr. Dick Bartman, State Planning Coordinator
FROM: Jon F. Jacquot, Chief Engineer
DATE: January 24, 1986
RE: Draft Resource Management Plan for the Lander Resource Area/BLM, State Identifier No. 84-138

The subject Draft Management Plan was reviewed by Bob Larsen of our office and he has determined that there is no need for this office to make comment on the subject matter.
Please find attached a completed copy of your offices' note of transmittal.

JFJ:gp
Attachment

Response to Letter 572

1. Thank you for your comment.

W. S. G. B.

Dick Loper
POB 1202
Lander, Wyo. 82520
1-332-2601
02/14/86

Mr. Jack Kelly,
Lander BLM Area Manager
POB 885
Lander, Wyo. 82520

Dear Mr. Kelly:

On behalf of the Wyoming State Grazing Board I would like to convey our support for the Proposed Action submitted in the Wilderness Supplement to the DRAFT Lander RMP. We feel as the your office has correctly evaluated the majority views of the informed public concerning these areas.

As an organization we would also like to state our general support for the Proposed Action segments of the Grazing Supplement to the Draft Lander RMP. However, individual members wish to reserve their right as permittees to continue to work with the Bureau to refine the proposals for areas that affect them and their operations.

Thank you for your review of these comments. We would like to compliment you and your staff for a fine professional effort in a difficult job and we look forward to participating in the continued management of these public lands for their multiple use values.

Dick Loper
Dick Loper for the
W.S.G.B.

Response to Letter 575

1. The Lander Resource Area acknowledges and thanks the Wyoming State Grazing Board (WSGB) for their support of the Proposed Action in the Grazing Supplement to the Lander RMP/EIS. We will continue our consultations with individual members as we begin monitoring and implementation.



THE WILDERNESS SOCIETY

NORTHERN ROCKIES REGION

February 13, 1986

Jack Kelly, Lander Resource Area Manager
PO Box 185
Lander, Wyoming 82520
Re: Lander RMP/DEIS

Dear Mr. Kelly,

The Wilderness Society is a national organization dedicated to the preservation and wise management of public lands. We support wilderness designation for the Sweetwater Canyon as you have recommended, but believe that the surrounding wild hills of the WSA should be included resulting in a total wilderness recommendation of 9,056 for that WSA. We cannot agree that the outstanding resources found in the Sweetwater Rocks Complex will be protected without wilderness designation and recommend that the full 32,173 acres be added to the National Wilderness Preservation System. Likewise, Copper Mountain WSA contains crucial wildlife habitat, outstanding scenery and recreation opportunities. It too should, in its entirety, be designated wilderness. Although designated wilderness is within close proximity to these areas being discussed, those forest wildernesses are not similar in ecology or opportunities. They cannot "substitute" for protection of these SNM lands. Putting these WSAs into the National Wilderness Preservation System is an important investment for the future. No commodity resources will be foregone and expressed objections are not serious.

The DEIS states that among the environmental resources not affected by the plan are vegetation, visual resources and water resources. This simply cannot be true. Surely impacts from motorized activity, minerals or oil and gas development, and livestock production will affect all three of the resources. Perhaps it is a result of this perception on the part of SNM that has resulted in essentially no analysis being presented in the documents on the effects of a no wilderness recommendation for the WSA other than the canyon portion of Sweetwater Canyon. How the wilderness values of these lands will be affected is a very important

U.S. WILDERNESS SOCIETY, 1000 17TH AVENUE, SUITE 100, DENVER, CO 80202

Response to Letter 577

1. See general response to wilderness comments.
2. This is a correct assessment of the capitalized values of AUMs. Grazing Supplement text will be revised to remove discussion of this subject.

part of the data base that must be reviewed in order to make an informed decision about these resources. This proposed plan cannot be considered complete until these issues are addressed for all of the areas and for all possible activities under multiple use management.

The wilderness recommendation is sorely small compared to the resources that deserved protection. As pointed out in the DEIS, the socioeconomic base of the area depends upon tourism as much as any other aspect of the local economy. It also appears to contribute more directly to jobs and income (refer to Table 2-6) than any other industry. Those very resources that would be jeopardized by inadequate management are the livelihood of Fremont County. The DEIS states in numerous places that the livestock industry would remain essentially the same and that the likelihood for minerals production is low. Oil & gas production potential is low in all areas except one where the geologic formations indicate a moderate possibility of commercial production. Such insubstantial adverse impacts positively support the desirability of wilderness designation.

Sweetwater Canyon WSA

Clearly the canyon itself supports many outstanding resources including a regionally important trout fishery, habitat for moose, elk, deer, pronghorn antelope, many furbearers, raptors, and numerous small game and shore birds. The canyon riparian zone provides critical winter habitat for moose from the Wind River Range, severe winter habitat for elk, and yearlong habitat for mule deer. The fishery in the river is generally described as good in terms of population however no clear statement is made regarding potential and optimum condition or the present measure of sedimentation, against which impacts of future activities could be measured. The DEIS does state that streambanks are "mostly" stable and that "eroding gravels have variously been described as good to poor." It also states that "one trout problem within the study area is localized damage to streams by livestock." It points out that there is a range of severity with this problem. Stream siltation and sloughing have occurred as well. Furthermore, two of the tributaries, Willow and Norman Creeks, receive significant damage from livestock including vegetation destruction, bank damage and siltation all of which result in fishery degradation. The Wyoming Game and Fish Department has identified the Sweetwater River in the canyon as an important regional fishery that should be protected and enhanced. The current management approach clearly is inadequate and the fishery and wildlife habitat resources are in jeopardy. Although this plan recommends wilderness protection for the canyon itself, it does not recommend protecting portions of the WSA through which Willow and Norman Creeks run. These tributaries feed

to be protected for the long-term health of the regional economy, biological diversity, the fishery and the habitats and water resources supported by the riparian resource. Wild wilderness protection greater assurance against that damage, especially from escalating livestock grazing and surface disturbing activities will not occur.

In the plan no description was given of the ecological and range conditions and trends of the Sweetwater Canyon WSA beyond the classification that there were one or more severe problems in the canyon. What is the condition of the riparian zones within the canyon and tributaries? This information is important for the public to review in order to determine what kind of management and protection is necessary. The ecological condition of the hills surrounding the canyon is important in its own right but is also important for the fundamental contributions they make to the canyon. The vegetation contrast between the canyon and the surrounding rolling hills is dramatic. None of the three ecosystems in the WSA are represented in the National Wilderness Preservation System. Conflicts that do exist are minimal in that they involve elimination of motorized vehicles yet this represents a small problem since most of the WSAs are roadless and current activity is insignificant. Without wilderness protection for the 1,100 acres beyond the canyon, possible introduction of surface disturbing activities would change erosion rates and could cause adverse effects on the Oregon/Horned Lizard Trail. As pointed out in the OHS, the importance of this portion of the Trail is derived in great part from the pristine character of it and the surrounding area. We certainly support BLM's recommendation for wilderness protection for the canyon and point out that this recommendation is also supported by the National Park Service which studied the Sweetwater River for inclusion in the Wild and Scenic River System. We believe, however, that because of outstanding values and no significant conflicts or severe impacts on the local socioeconomic factors that the entire WSA should be designated wilderness.

Sweetwater Rocks WSAs

The four WSAs within this management unit have significant recreation and historic value. The large expanses of exposed granite, not found elsewhere in central Wyoming, form an impressive scenic panorama for the historic area. Rock climbing opportunities are considered world class, especially on Lizard Dome, Split Rock, Moonstone and the Great Stone Face. Additionally, recreational use and interest in the historic trails has been increasing. None of the ecosystems found in the WSAs is presently represented in the National Wilderness Preservation System. No significant resource conflicts exist within the WSAs.

- 3 -

although there are problems associated with access to the WSAs over private lands owned by area ranchers.

The conflicts that do occur stem from cattle grazing operators who fear curtailments in their operations and the concern of private landowners who are concerned about trespasses. The cattle operations themselves would remain basically intact with no reductions in AUMs and since most cattle herding and fence repair is now done by horseback, the nonmotorized restriction will not adversely impact operations either. In fact, only a small portion of the grazing allotments in the area are within the boundaries of the WSAs both in terms of acreage and forage. In regard to objections made by local landowners it is important to point out that their concerns stem from a fear of increased usage yet BLM estimates that usage will only increase by 10% and that this increase would occur with or without wilderness designation. It does appear though that the agency should develop solutions to any problems public land users cause to the private sector, but foregoing wilderness protection for these lands is too extreme a solution and will not, in fact, solve the problems of access at all.

Two of the WSAs are historic and present bighorn habitat although no population exists now. A sheep population was known to exist as recently as 1982 however none were sighted in 1983. Additionally, these WSAs have high potential, and probability for bald eagle, peregrine falcon and the black-footed ferret. BLM has an affirmation duty to protect these habitats for these threatened and endangered species and indeed enhance their population development. Wilderness designation would complement those goals and guarantee habitat protection whereas a return to multiple use management would reestablish an uncertain situation.

The OHS addresses the private sector's capitalized values of AUMs in numerous places with varying degrees of disclaimers. This repeated consideration gives this situation a status that it should not have in this public document. We believe that since the BLM is specifically and legally prevented from officially recognizing these privatized values attributed to public assets, they should not be part of the resources summary that is considered in the wilderness designation question. The government has taken the position not to engage in this aspect of dealing on public lands thus it should not be considered in the analysis and planning process.

We support wilderness designation for these four WSAs. It would be undesirable not to protect the important Sweetwater Rocks' landscape and historical sites. The cultural and wildlife resources, especially these habitats for bighorn, peregrine falcon and black-footed ferret, could be displaced by surface disturbing activities, and the diversity found in these WSAs would not be added to the

- 4 -

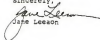
WMSs. As mentioned earlier, the recreational opportunities have international significance. The wilderness areas nearby do not represent a similar type of environment and cannot be considered as equivalent opportunities or resources. Grazing would continue virtually as it is now, and since the potential for oil & gas, and mineral development is low thus unlikely, conflicts in general are insignificant. It appears that the only opposition to wilderness designation comes from six local landowners.

The possible construction of powerlines was mentioned in the "Environmental Consequences, Sweetwater Rocks" portion of the DWS yet much corridor and use impacts they cause were not addressed elsewhere in the DEIS. Certainly utility corridors are major activities and cause major adverse impacts to the environment. Full data collection, analysis and public review of any utility corridor activity under consideration must be incorporated into this stage of the review process.

In conclusion, The Wilderness Society supports wilderness designation of the Sweetwater Canyon WSA (WV-030-101) 9,054 acres; Tankin Dome WSA (WV-030-123) 5,956 acres; Split Rock WSA (WV-030-121) 12,748 acres; Savage Peak WSA (WV-030-123a) 7,061 acres; Miller Springs WSA (WV-030-123b) 8,429 acres; and Copper Mountain WSA (WV-030-111) 6,858 acres for a total of 48,069 acres. This total represents less than 2% of the land managed by the Lander Resource Area. We take this position because of the natural resource values found in these WSAs including but not limited to important wildlife habitat, world class recreational opportunities, important historical trails and cultural resources, and the unique contributions they would make the National Wilderness Preservation System. No significant conflicts exist that would be adversely affected by this designation.

Thank you for this opportunity to comment.

Sincerely,


Jane Leeson

- 5 -

589



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
ONE DENVER PLACE - 899 16TH STREET - SUITE 1300
DENVER, COLORADO 80202-2413

EPN-4A

FEB 20 1999

Jack Kelly, Area Manager
Bureau of Land Management
Lander Resource Area
Post Office Box 589
Lander, Wyoming 82520

Re: Lander Draft Resource Management
Plan/Environmental Impact
Statement (RMP/EIS), and Grazing
and Wilderness Supplements

Dear Mr. Kelly:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VII Office of the Environmental Protection Agency (EPA) has reviewed the referenced documents. We have followed up with the District Office has provided very helpful assistance during our review.

These documents contain several highly commendable components that contribute to the objective of a "comprehensive framework" for managing and allocating public land and resource uses in the resource area" as discussed on RMP/EIS page 1. Examples of such components include:

- o recognition of areas of deteriorated resource conditions,
- o recognition of important fisheries and watershed values throughout the documents,
- o mapping of important fisheries and streams,
- o identification of priority areas for riparian-wetland area and aquatic habitat management/improvement, and
- o use of the Grazing Supplement for setting an assertive approach to addressing areas of deteriorated rangeland resource conditions.

Our enclosed comments are intended to constructively contribute to this "comprehensive framework" by covering a range of concerns and recommendations regarding water quality, riparian and wetland areas, aquatic life, and watershed and rangeland resources.

Many of our detailed comments relate to water quality objectives shared by both BLM and EPA. We feel that existing riparian/wetland management and water quality and designated beneficial uses should be described more thoroughly. Water quality-related values are to be considerations in future

Response to Letter 589

1. We currently are not monitoring any streams in the Lander Resource Area. Impairments do exist to water quality, but are not well documented. Without monitoring data, trends cannot be documented. BLM complies with the antidegradation policy and objectives set by the State of Wyoming. Wyoming's Department of Environmental Quality (DEQ) is the agency that is responsible for monitoring water quality in this state. The state has designated what it considers to be beneficial uses.
2. The RMP/EIS is a generalized land use plan intended to identify preferred uses for large areas. Once the use decisions are made for the management units, we will be preparing detailed activity plans which would take into consideration water quality beneficial use objectives and anticipated impacts on water quality by implementation of the activity plan. Also, development (i.e. drilling) on individual leases is permitted on a case-by-case basis under an application for permit to drill (APD). The federal and state laws—Clean Water Act, Federal Land Policy and Management Act (FLPMA), and the Wyoming Environmental Quality Act—as they apply to water quality

1 activity planning; however, a better description of the status of these values in the RMP would help provide a better base for such planning. Based on the above information, we would like to see the water quality objectives (both for numeric and narrative criteria, including entrapment, beneficial uses) more directly described by management plans.

2 The preferred alternative appears to be designed to provide BLM with maximum flexibility in managing leases in areas of high potential for oil and gas development. This approach can provide an incentive to lessees to be actively involved in developing project-specific requirements for environmental resource protection. However, we feel that the leasing constraints for meeting water quality benefits and use objectives should be addressed more specifically. Additionally, regarding local mineral development, we have expressed concerns about the potential for the applicable constraints from the Clean Water Act and the Federal Land Policy and Management Act of 1976.

The State of Wyoming will be addressing entrapment requirements for appropriate stream segments during this fiscal year. We encourage the BLM to be aware of this process and the applicability of any new requirements that may apply to Lander Resource Area streams. The State of Wyoming contact person is Larry Robinson in Cheyenne (777-7075), and the EPA contact person is Bill Wurtzler (PWS 564-1506 or 302-262-1772).

Based on our concerns and the criteria established by EPA to rate adequacy of draft EISs, we have rated these draft EIS documents as Category CC-2 (environmental concerns-insufficient information). The EPA review has identified additional corrective measures, data, analysis, and discussion that are recommended for the proposed RMP and final EIS and supplements. If further EPA assistance is needed, please feel free to contact Doug Lockwood of my staff at PWS 564-1777 or 302-262-1772.

Sincerely,

Dale Yodanis

Dale Yodanis, Chief
Environmental Assessment Branch

Enclosure

cc: Richard Bastin, Rawlins BLM District Manager
Hillary Dean, Wyoming BLM State Director
Randy Hood, Director, Wyoming Department of Environmental Quality
William Dickinson, A-10A (DPA, H.O.)

**EPA DETAILED COMMENTS ON BLM DRAFT LANDER RESOURCE
MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT (RMP/EIS),
AND GRAZING AND WILDLIFE SUPPLEMENTS**

Water Quality, Watershed, Aquatic Life

3 The RMP/EIS and supplements recognize water quality and fisheries throughout. Mapping and testing the affected fisheries (pages 01-02) is particularly commendable in establishing a framework for future activity planning. The discussion of existing chemical water quality monitoring on pages 16-19 seems to be correlated to the numeric criteria in the State water quality standards (WQS) for the streams. Existing impairments to WQS numeric criteria and designated beneficial uses and trends need to be documented as part of the affected environment. Such information should include condition and trends of any fisheries/aquatic life beneficial uses designated for the Lander Resource Area (LRA).

4 The RMP/EIS should address the consistency of the issue resolution determinations with EPA's current water quality standards regulation (40 CFR Part 131) which does not allow the state to remove a designated use (i.e., if the use is existing unless a use requiring more stringent criteria is added), or 21 if the designated use can be attained through required technology controls or best management practices (Part 131.10). On page 16, the RMP/EIS states that "stream without a viable trout population, but with the potential to support trout, have not been discussed." However, if these streams fall into the second category above, i.e., are considered "attainable use" as defined in 40 CFR Part 131.10(c), they should be addressed in the beneficial uses/WQS discussions.

5 The RMP/EIS should document BLM coordination with the State in addressing the management of any priority water bodies (i.e., 453,200 acres of high oil identified in the most recent Section 303(b) water quality assessment report. The Drafting Supplement mentions an "informal agreement" with the Wyoming Department of Environmental Quality (WDEQ) for coordination in "solving water and air quality problems in the state" (page 48). The RMP/EIS and Drafting Supplement need to document the specific BLM-WDEQ coordination process including provisions for periodic meetings for RMP follow-up, for setting watershed priorities, and for evaluating RMP effectiveness in meeting WQS. The Drafting Supplement also recognizes BLM follow-up with completed 208 plans. However the status of the plan and BLM consistency requirements (as part of the comprehensive management framework) need documentation in both the RMP/EIS and Drafting Supplement.

6 Under the preferred alternative, "protection of streams, riparian areas, . . . could be significantly reduced in areas of 453,200 acres of high oil and gas potential" (page 64). The RMP needs to address the protection of water quality standards as a matter of public health and safety, and the "leasing and lease development processes. Can measures other than surface occupancy and seasonal restrictions be prescribed to provide the necessary water quality protection? In addition, the above direction appears to be

protection would be followed as closely as possible. Operating constraints would be applied as mitigation to impacts when notices or plans of operation are approved by the BLM.

The BLM in Wyoming works very closely in a successful agreement with the Wyoming Department of Environmental Quality (DEQ) in reviewing and approving exploration and mining plans under the General Mining Law. To date, the Land and Water Quality Divisions of Wyoming DEQ and the Lander Resource Area have been diligent in developing operating constraints to protect water quality.

3. See Response 1, above. The Wyoming Water Quality Assessment, prepared by the Wyoming DEQ, contains very good data on existing water quality impairments and trends and is included in the existing environment of this document by reference. The appropriate text changes have been made.

4. Some of this is addressed in the revised Water Rights section. Water quality and flow records, in general, are lacking. This is why we could not elaborate on streams without a viable trout population.

5. Administrative procedures for coordinating between BLM and the State of Wyoming are a matter of record and upon request can be discussed at length with you. To add this information in the RMP would serve only to add bulk and would not effect either the planning decisions or the analysis of environmental consequences.

6. Specific mitigation for water quality concerns of development activities (e.g. drilling) are addressed in individual authorizations for those actions, based on a more precise knowledge of the value of the development.

7. If the waiving of a lease requirement is considered, for example in an area prospectively productive for oil or gas, such area waiving would be evaluated in an environmental analysis prior to leasing, and then only be waived if the requirement is unnecessary to prevent significant impacts.

If lease requirements are waived, they are waived through an environmental analysis process (EAs, EISs). The coordination process is the process normally used when developing EAs or EISs.

8. See Response 2, above.

9. For a discussion of priority planning objectives and treatment areas, see the Grazing Supplement to the Final RMP/EIS that deals with grazing allotment categorization (Grazing Supplement Part A - Introduction; Allotment Categorization; Part B - Management Actions Common to All Alternatives:

6 | contrary to BLM Manual 6740 which states BLM policy to: "A. Avoid the
7 | strip- and short-term adverse impacts associated with the disposal, loss, or
8 | degradation of wetland-riparian areas", and "C. Preserve and enhance the
9 | natural and beneficial values of wetland-riparian areas. . ." [Part. 66].

7 | The preferred alternative (page 40 and elsewhere) would give considerable
8 | discretion to BLM to waive leasing requirements for resource protection. The
9 | RMP needs to address the public/inter-agency coordination process for such
10 | leasers when water quality standards (including beneficial uses) are
11 | affected. Furthermore, the public/inter-agency coordination process for
12 | setting leaseable mineral development requirements for resource protection in
13 | areas of high oil and gas potential needs to be described. What is the
14 | coordination process for setting leaseable mineral development requirements?

8 | Another mineral development concern that needs to be thoroughly "fleshed
9 | out" in the proposed RMP/EIS is the legal response degradation allowable
10 | under the 1872 Mining Law (page 195 and 216). The document states that
11 | "placer mining and dredging, which causes destruction or long-term degradation
12 | of a trout stream and riparian habitat, can legally occur" (page 195).
13 | The RMP/EIS needs to incorporate the requirements to protect AQS (both numeric
14 | narrative criteria and beneficial uses such as for cold water trout stream)
15 | under the Clean Water Act (CWA) (Section 301(c) and 40 CFR Part 131) and EPA's
16 | degradation requirements. RMP requirements to comply with AQS (Section
17 | 202(c)(1)(B)) and to prevent "unnecessary and undue degradation" (Section 202(a))
18 | should also be incorporated. A CWA Section 404 dredge and fill permit or
19 | Section 402 point source NPDES discharge permit may be required for a
20 | 595 F. 2d 368 (10th Cir. 1979).

9 | The use of watershed planning in the LRA for cumulative impact analysis
10 | is as a mechanism to coordinate site-specific project priorities and
11 | objectives for multiple use and/or multiple ownership watersheds should be
12 | addressed. What are the decision criteria for doing such plans vs. individual
13 | project activity plans? What are the watershed planning/treatment priority
14 | areas? Regarding the discussion of the Soil Conservation Service (SCS) on
15 | Grazing Supplement page 47, we believe that the discussion should be expanded
16 | to create a stronger framework for mixed ownership watershed planning
17 | and implementation.

10 | We comment BLM for proposing a strong approach to improving deteriorated
11 | rangeland resource conditions, at least for Category I allotments, in the area
12 | covered by the Grazing Supplement (pages 33 through 44 and elsewhere). We
13 | would like to see the Supplement define in more detail the implementation
14 | strategy, particularly its budget, needed to have the improvements happen.

11 | We do not feel that ground water resources were sufficiently addressed;
12 | however, general management practices are discussed which relate to ground
13 | water protection. The draft RMP/EIS mentions that ground water resources,
14 | namely water wells and springs, may be affected by geophysical (tectonic)

11 | exploration. On page 60, the plan states that "shot-holes (from geophysical
12 | exploration) are plugged according to Hearing and Gas Conservation
13 | rules . . .". These plugging practices should greatly enhance ground water
14 | protection.

12 | Under EPA's rules for the Underground Injection Control Program
15 | (40 CFR Part 146.20(b)(1)), operators of injection wells must protect all
16 | fresh water aquifers (defined as any aquifer of 10,000 parts per million total
17 | dissolved solids or less) by setting surface casing with cement through all
18 | fresh water aquifers and into the underlying confining zone. We support
19 | consistency between EPA and BLM in protecting "fresh water aquifers" under the
20 | same definition. Consequently, further elaboration on BLM requirements for
21 | oil and gas leasing to protect "fresh water aquifers" is requested.

13 | We suggest that the RMP determine the formal, pre-discharge coordination
22 | process between the Lander Resource Area and the Corps of Engineers (COE) in
23 | applying the Section 404 program on projects that would affect streams and
24 | wetlands under COE jurisdiction. Such factors as: notification of projects to
25 | be done under nationwide (or state or regional) COE permit; identification of
26 | projects needing an individual permit; and development of mutually agreeable
27 | mitigation requirements for individual projects should be part of the
28 | description. We recommend that the coordination process include notifying the
29 | COE of all projects that would discharge into or affect streams, lakes, or
30 | wetlands. The COE will then determine whether an individual permit is required.
31 | In addition, the EPA is currently developing a wetland mitigation guidelines which will be forwarded to BLM when
32 | completed.

14 | We suggest expanded use in the final RMP/EIS and grazing supplement of
33 | summary tables (such as Table 6-1) for comparing environmental consequences
34 | between alternatives. Our specific concern is to use the summary tables to
35 | consolidate environmental impact discussion for water quality/habitat uses,
36 | watershed protection, and for air quality and air quality related values.

Riparian Areas - Wetlands

15 | Areas of existing poor riparian area conditions are recognized in the
37 | RMP/EIS and Grazing Supplement. We comment BLM for addressing management
38 | direction to improve riparian and associated resources. Examples of such
39 | actions include the intent to develop "aquatic/riparian habitat management
40 | plans" for "parts of the upper Snake River drainage and the Snake River
41 | for the Green Mountain Area" (page 26), and to improve riparian areas in the
42 | area with grazing planning areas. Are there to be demonstration areas? how
43 | many miles of improvement are targeted?

16 | The RMP/EIS discusses habitat values of the resource area
44 | wetland-riparian areas. Waterfowl habitat condition is not expected to
45 | improve significantly on Category I allotments in the Gas Hills grazing

Implementation of Management Actions, and
the section entitled Range Improvements).

In short, the category I grazing allotments are
the focus for improvement plans and actions.
Appendix A, Table A-3 and Table A-7 of the
Grazing Supplement, will give you an
indication of what allotments are involved in
the more intensive watershed planning.
Consultation with interested parties, which
would include all involved landowners, is an
integral factor in watershed planning.

The Final RMP/EIS is a general planning
document and it is felt that more detailed
planning would not be appropriate or
necessary for this plan. Also, where
practicable, watershed improvement efforts
are coordinated and facilitated through Soil
Conservation Service (SCS) programs.

10. The Rangeland Program Summary (RPS) and
Final Grazing Supplement will contain a more
specific plan and timetable for implemen-
tation of the proposed management
actions.

Range improvements are proposed and
budgeted for on a yearly basis. At this time,
we are unable to project their future annual
expenditures for range improvements.

11. For RMP-level planning groundwater re-
sources are addressed adequately. Specific
groundwater resource issues, impacts, and
mitigation are dealt with in the specific
proposed actions through environmental
analyses, applications to drill, allotment
management plans, and other case-by-case
authorizing actions.
12. We also support consistency between the
Environmental Protection Agency (EPA) and
BLM in protecting freshwater aquifers under
the Underground Injection Control Program
of EPA. The Lander RMP/EIS is intended as
a general land use plan and specific dis-
cussions about many of the land uses and
impacts associated with these uses will be
addressed during activity planning. For all oil
and gas wells drilled in the Lander Resource
Area, a geologic review of the drilling program
is completed to assure that all freshwater
zones are protected by surface casing. Before
produced waters are impounded in unlined
storage pits, we also do a study to determine
the impacts. After the land use plans are
adopted for the management units, we will
be developing activity plans to implement
them. At this time we would develop
constraints necessary to protect ground-
water.
13. There have not been any Corps of Engineers
404 permit actions initiated by the BLM in
the Lander Resource Area. Should the need
arise in the future, proper procedures will be
followed.

- 16 planning area, except for only small areas (Draft Supplement page 38). This direction appears to contradict the fairly aggressive direction in the rest of the Supplement to correct degraded wetland-riparian conditions. Standards for wetland-riparian area restoration and improvements for the resource area need to be described. Examples include BMP guidelines for forage utilization rates and ecological conditions necessary for meeting water quality standards; beneficial uses, streambank stability, and for wetland protection/ rehabilitation. Over-hanging vegetation is important to water quality and riparian condition. What are the risk criteria for over-hanging vegetation? The resource area wetlands (including aquifers and seasonal) should be more clearly located.

- 17 Logging within 100 feet of perennial streams would be allowed (page 35). More specific BMP stipulations and management criteria should be described that would provide adequate protection of riparian areas and associated aquatic systems for logging activities. What are the BMPs for controlling and revegetating riparian area disturbances? The acceptable percentage of tree removal under selective cutting methods for riparian areas should be stated. Additionally, the requirements for keeping logging roads out of wetland-riparian areas need to be identified.

Air Quality

- 18 Emissions of "potentially dangerous gases" from oil and gas wells are recognized in BLM/EIS pages 224 and 273. The flaring of sour gas at individual wells should be addressed. Flaring is a significant source of sulfur dioxide emissions at many Wyoming wellheads. It may contribute to acid deposition in nearby wilderness areas. The WDO is concerned about flaring in the well fields since it may represent a substantial portion of the total sulfur dioxide emissions from the natural gas industry in Wyoming. Currently, these emissions are not regulated by the State except possibly as open burning or emergency spouts, yet such emissions may in some instances be a routine, planned activity. It is recommended that the BLM (through RMP direction) include in its oil and gas leases a clause requiring that such emissions be quantified and reported.

Resource Monitoring

- 19 We realize that detailed resource monitoring requirements are usually developed at the activity planning stage. Due to the technical complexities involved in designing and implementing a monitoring program that adequately tracks watershed activities and water quality objectives (including antidegradation requirements and other narrative WQS such as aquatic life, as well as numeric WQS), the RMP should be quite specific about BLM plans to conduct monitoring and evaluations to determine achievement of water quality objectives. We suggest that the following components of the comprehensive water quality monitoring strategy be addressed to the extent possible at this level of planning:

- o goals and objectives,
- o types of surveys (long-term, intensive) or assessments (including habitat evaluations and biomonitoring) to be used,
- o parameters and frequency to be monitored and their suitability in achieving the monitoring goals and objectives,
- o management and environmental indicators, e.g., aquatic habitat, sediment delivery, to be used in assessing impacts of past, ongoing, and proposed activities,
- o use of activity monitoring in sensitive areas,
- o monitoring responsibilities of BLM, mineral development lease/clean holders, and other state and federal agencies,
- o mechanism for monitoring implementation,
- o determination of adequacy of best management practices,
- o reporting requirements,
- o position or person responsible for monitoring program data collection, analysis, reporting, etc.,
- o vegetation (including riparian area) monitoring intensity, type, and priorities,
- o fisheries objectives, monitoring methodology, and threshold levels for modification in management direction,
- o the feedback loop to achieve timely modifications to activities in response to monitoring results.

14. Table 2-4 in Chapter II of the Final RMP/EIS contains a comparison of impacts for the proposed action for grazing management. Appendix 1 contains an alternative comparison for the other resources and alternatives covered by this plan.

15. A Bureau riparian policy is currently in draft form. Specific supplemental guidance is still being formulated which will be consistent with the draft policy. When the supplemental guidance is released, we can then develop these management plans, and identify specific areas.

16. There is very little potential for waterfowl habitat in the Gas Hills Study Area as there is very little riparian habitat in the planning area. Most of the potential exists as stock-water ponds are developed.

Standards for wetland-riparian area restoration and improvement will be addressed at later dates, when individual activity plans are developed on an area-by-area basis. Examples include Allotment Management Plans and Habitat Management Plans.

17. Guidelines for logging and road building and maintenance are included in BLM manuals and the Management Situation Analysis, which was prepared in advance of the Draft RMP/EIS. These guidelines are used to prepare timber sale stipulations for individual timber sales.

There are very few perennial streams in forested areas in the Lander Resource Area, and internal policies are considered adequate to protect the few riparian area crossings needed.

The district engineering staff is consulted on all large culvert installations; all roads constructed for timber sales are seeded with grasses and legumes; waterbars are constructed in all logging roads; and roads are out-sloped at the end of sales, to get water off roads as quickly as possible. Main roads into the areas are already in place. All that would be needed for logging is to improve the main road surfaces, install culverts at all stream crossings, and build needed spur roads.

All riparian areas, including intermittent streams, are treated the same with culvert installation and crossing improvement before logging takes place.

18. Sour gas emissions, from which the sulfur dioxide referred to is derived, are addressed during the Application for Permit to Drill (APD) stage and through Notice to Lessees (NTL-4A). The planning document was not intended to address matters as specific as this. Conditions of approval for APD's do require

the reporting of gas flaring during drilling and completion practices.

19. Detailed resource monitoring requirements are developed at the activity planning stage. Before specific management actions are identified, attempts to formulate a comprehensive water quality monitoring strategy would be premature.

610

Mr. Jack Kelly
Lander Resource Area
Lander, Wyoming 82500

Dear Jack:

Thank you for this opportunity to comment on Lander Resource Area RMP. After working with you and others on the plan, I can certainly appreciate the time and effort that went into it.

1. First, one point about gathering public input--RLM did not send me any information concerning the comment period or public meetings. I would assume that to meet NEPA requirements, RLM should at least notify the folks on the mailing list.

I am glad RLM is compiling a set of goals and guidelines for long-term direction. But I am disappointed that, as stewards of the land, we have drafted a plan which concentrates almost completely on commodity production and badly neglects other uses.

When I was with the Lander RLM, many of my fellow employees understood and respected natural systems. They enjoyed working, hunting, and sightseeing with their families on the undeveloped tracts of our resource area. Yet this management plan largely ignores aesthetic and scientific values while promoting unlimited development and destruction of wild areas. I must question the directive which guided production of such a plan, despite the efforts of knowledgeable professionals.

2. One of the most obvious examples is the preferred grazing alternative. Not only does it allow for a possible 21 percent increase in stocking rates, it advocates numerous impacts in the name of range improvement. We need not clutter the range with additional fences, reservoirs, and water troughs. Nor should herbicides be used to reduce sagebrush. I am sure RLM range consultants know that livestock caused the initial vegetation shifts and that "undesirable" species will continue to dominate as long as stock overgraze the desirable ones.

3. In the forest management section of the RMP, I was surprised to see a proposed increase in timber harvest of over 100 percent. Now our resource area provides 6.1 MMBF of timber on an economically sound, sustained-yield basis! Trees taken in the Lander Slope and South Pass areas are simply not worth the resultant roads and denuded land.

Response to Letter 610

1. Information concerning the 90 day comment period was stated in the State Director's letter to RMP readers on page 1 of the Draft RMP/EIS. We also issued news releases and public announcements about the comment period and public meetings on the RMP. A newsletter describing the RMP process and inviting interest, involvement and participation in the process was sent to the people on our mailing list.
2. The Bureau of Land Management is a multiple-use agency that manages many land uses on public land. Range improvements are not constructed for the exclusive use of privately owned livestock. Range improvements benefit wildlife and watershed resources as well as livestock. The Grazing Supplement does not propose a 21 percent increase in stocking. According to our range inventory information, if the range were producing at its potential, the stocking rate would be between 4 percent below and 21 percent above current levels.
3. The proposed amount of harvest is not meant to be a sustained yield figure. On Green Mountain, the objective is to salvage the dead and dying overmature timber and create new

4. BLM should not open any more land for mineral activities. The current policy withdraws only five percent of our resource area from oil and gas development, and the RMP calls for reducing this to one-fifth of our present. I hope that the expected 1 percent yearly growth of oil and gas development over the next 20 years will be accompanied by a comparable reduction in private acreage and quality trout streams. Areas such as Red Canyon, South Pass, Lander Slope, East Park, Whiskey Mountain, Dabois Badlands, and the Shads near Snake Canyon State Park deserve withdrawal from all forms of mineral entry.

BLM should also curtail mining impacts on Green Mountain. This is one of my favorite places--my home during the summer of '80 when I volunteered for BLM. Yet I hate to go back and see how this mountain oasis is being devastated.

5. Some of the impacts of resource exploitation could be prevented if BLM would implement restrictions with some teeth in them. For instance, utility systems should be restricted to existing corridors in all cases, not just "when possible" (or convenient for developers).

6. The RMP should specify maximum allowable levels of sitation, surface disturbance, habitat destruction, and other impacts, and measures to insure these are met.

I was glad to see that the RMP does not call for additional recreation developments. The Continental Divide National Scenic Trail is no doubt more challenging and enjoyable without a fixed route through the area. And our present campgrounds are well-suited for appreciation of surrounding scenic and cultural resources.

7. More of our efforts should go toward preserving historic structures. At Miner's Delight the buildings are deteriorating badly and at Redwood Springs, one of the three cabins disappeared completely within the last 10 or 15 years. Bonds need to be fixed, walls stabilized, and drainage provided away from the foundations. I shall interpretive signs or brochure at Miner's Delight would also be helpful for visitors.

Other cultural resources deserve attention as well. I support designation of the Oregon/Mormon Trail corridor as an Area of Critical Environmental Concern, and South Pass as a National Register district. The entire resource area should be thoroughly researched for archaeological values, just as it has been for range, mineral, and timber values.

8. Most important to me, BLM must strive to preserve the remaining scientific, aesthetic, and natural values of our pristine areas. I support Beaver Run and Red Canyon National Natural Landmarks, and portions of Beaver Creek, Gas Hills, Lander Slope, Red Canyon,

8. And South Pass as Areas of Critical Environmental Concern. I would also encourage establishment of Research Natural Areas to preserve representative communities for baseline data on Wyoming's ecosystems.

9. Wildlife habitat deserves enhancement in all areas, especially those of critical and crucial range. However, I do not feel that we should use herbicides and fertilizers. We need to concentrate on alleviating competition from domestic animals, weeds, and human development.

I would also like to see bighorn sheep restored to their home range in Sweetwater Rocks. Perhaps someday we could restore wolves, grizzlies, bison, and black-footed ferrets to the areas they once frequented, too.

10. Finally, I cannot understand BLM's denial of the worth of our outstanding Wilderness Study Areas. During my work with Lander Response Area, I inventoried each of these, and have also explored them on my own time. All eight are prime candidates for inclusion in our National Wilderness Preservation System. Each one has scenery, solitude, vegetation types, and recreation opportunities duplicated nowhere else in the nation.

Yet BLM downplays their values and cooptives excuse me to recommend them for wilderness designation. It is astounding that such a proposal would come from my colleagues--professionals entrusted as caretakers of some of Wyoming's finest treasures.

I hope that in revising our RMP, BLM will take to heart its multiple-use mandate and provide a plan which gives fair value to all resources. I want my children to be assured of the same chance I had to hike over rolling hills to the top of Gas Canyon, peer into cabins at Miner's Delight, study tipi rings in Sweetwater Rocks, and see the beauty of Wyoming from the top of Green Mountain.

Most sincerely,

Lynn Kinter

Lynn Kinter

stands of fast growing, healthy trees. This will probably not take place as quickly as desired because of the present market conditions.

In the South Pass area, the small amount of timber that may be cut, would not require any new roads. In Lander Slope, the main roads are already in place; only a few temporary roads would be needed, and they would be closed after logging was completed.

Clearcuts in lodgepole pine forests are seldom denuded for very long. They immediately begin to produce more forage for wildlife and domestic animals. If the right harvest system is utilized, they usually begin producing pine regeneration immediately. There are several areas on South Pass and Green Mountain that have produced big game hiding cover within 10 to 12 years of harvest.

4. See Response 1 to Letter 15.

5. It is not always possible to restrict utility systems to existing corridors even though that would be our preference as public land managers. If for no other reason, new service areas come into being and must be accommodated. The decision on routing utilities is based on a site specific environmental assessment which analyzes each individual proposal, using the guidelines of this land plan.

6. Siltation used here could more correctly be referred to as soil erosion. Siltation is the process of accumulating silt (alluvial sediment) in reservoirs, streams, on floodplains, etc. The rate of what is natural (geologic) erosion and what is accelerated erosion, due to various uses, must be determined before we can identify what levels of soil erosion are acceptable and which are not. Monitoring plans to assess runoff and soil erosion are currently being drafted. A recent prescribed burn Environmental Analysis (EA) calls for monitoring soil erosion and soil surface bulk density by methods that will quantify soil erosion before, and for some time after, the area is burned.

At present, the Soil Conservation Service (SCS) designates this part of the United States as having an annual acceptable soil loss tolerance of no more than 2 tons/acre/year. However, when specific soils are the focus of concern, it becomes apparent that some can withstand losses greater than this and not lose their productivity. Others may be greatly affected by losses that may, for the general region, be considered as slight.

Through the monitoring of soil and water resources, we hope to be able to more adequately assess affects of various management practices so as to afford the proper conservation necessary to maintain and enhance soil productivity and water quality.

7. The Preferred Alternative acknowledges the fact of deterioration of historic structures within the South Pass Management Unit. The Cultural/Natural History section of the Preferred Alternative for the South Pass Management Unit calls for measures like you recommended through accelerated stabilization, preservation, and protection of all significant historical sites within the South Pass area. The structures at Radium Springs are similarly covered under our Preferred Alternative recommendations for the Oregon/Mormon Pioneer Trail. Last year a fence was built around the Radium Springs structures and this year we plan to begin stabilization of the site's structures.

The Recreation section of the Preferred Alternative for the South Pass Management Unit recommends intensive management for Miner's Delight Townsite and Appendix 1 details information signing at Miner's Delight as one of the management actions selected for the Preferred Alternative.

We are continually building our archeological data base for the Lander Resource Area (LRA), but funding and staffing levels make it a slow process. Currently, we are using volunteers to identify sites in the South Pass area and it will take us several more years to cover that one area. As a result, any attempt to inventory the entire LRA in the near future would not be feasible due to the sheer magnitude of the task.

8. Please see the discussion of ACECs in the Final RMP. Most of the areas you have mentioned are included in that discussion. This RMP does not identify any Research Natural Areas (RNA) at present. We are involved with the Nature Conservancy to identify and preserve representative communities for baseline data on Wyoming's ecosystems.
9. Under the Preferred Alternative, the BLM considers crucial wildlife habitats adequately protected in view of our other multiple-use responsibilities. The use of herbicides and fertilizers will not likely be used on any large scale; however, we consider them as valuable tools among a variety of methods useful in managing habitats and rangelands. In some cases, they may be the only feasible way to accomplish objectives. In any such situation, they would only be used after all interdisciplinary, interagency and environmental reviews, and requirements were met.

The BLM will cooperate with the Wyoming Game and Fish Department (WGFD), interested sportsmen, conservation groups, and adjacent landowners in efforts to develop a workable bighorn sheep reintroduction program for the Sweetwater Rocks.

10. See general response to wilderness comments.

611



FRIENDS OF
WILD WYOMING DESERTS

P.O. Box 843, Lovell, WY 82431

February 15, 1986

Mr. Jack Kelly
Lander Resource Area
P.O. Box 585
Lander, Wyoming 82520

Dear Mr. Kelly:

- 1 While Friends of Wild Wyoming Deserts appreciates the opportunity to comment on the Draft Environmental Impact Statement for Lander Resource Area's Resource Management Plan, I must note with deep concern your failure to notify us of the public meeting dates and comment deadline--despite the fact that we expressed interest months before the draft was released. I request your explanation of such manifest delinquency, which leads me to question whether FWM is sincerely interested in gathering public input on the draft.

- 2 Based on careful reading and review, the major goal of the RMP appears to emphasize commodity production above all other values. Desert Friends cannot support this plan which disregards FWM's mandate for multiple-use management.

This emphasis on noncommercial development is shown in the three oil and gas alternatives to present management. They all call for increased acreage open for leasing. Indeed, the preferred alternative proposes opening the entire resource area for oil and gas and phosphate development. At very minimum, the following areas should be withdrawn from oil and gas, sustainable mineral, and phosphate development: lands around Snake Canyon State Park, Red Canyon, Lander Slope, South Pass, Whiskey Mountain, West Park, and Dubois Meadows. Unique cultural and natural resources in these areas deserve the highest degree of protection.

The RMP's commodity production slant is evident in proposed forest management. The preferred alternative recommends 6.2 NMSP of timber harvested annually--an increase of over 100 percent from the current level of 3.0 NMSP. Friends of Wild Wyoming Deserts insists that timber should not be harvested on the Lander Slope and South Pass Management Units. Even small volumes taken there would not be worth additional roads and impacts on watersheds.

The preferred plan for grazing also concentrates on costly, publicly-financed development. It calls for construction of 43 to 53 miles of fence, 10 reservoirs, and 57 other water projects, and for 8200 acres to be burned or sprayed with herbicide to reduce sagebrush.

Response to Letter 611

1. See Response 1 to Letter 610.
2. See Response 1 to letter 15.
3. See Response 2 to Letter 610.
4. See Responses 7 and 8 to Letter 610.
5. See Response 9 to Letter 610.

- 3 We oppose the use of herbicides and new developments for the benefit of privately-owned stock. Watersheds, wildlife, and vegetative resources should be improved through a reduction in livestock grazing, rather than the possible increase of up to 21 percent. Riparian zones in the resource area have long been in need of greater protection, and should now be seriously addressed.

The BLM states that public lands in the resource area are available for utility systems on a demand basis. We must oppose this provision and insist that BLM accept its responsibility, rather than leave protection of many pristine areas in the hands of developers.

While advocating many actions which degrade natural ecosystems, BLM proposes little to defend a fragile ecosystem, or even to mitigate environmental impacts. Restrictions contain weak wording, such as "where needed", "when possible", and "subject to water." The draft fails to name parties responsible for monitoring and ensuring protection during development activities. Should budget cuts occur, it is unclear how BLM will prevent unchecked environmental impacts.

- 4 Desert Friends urges protection of natural and cultural values. The portions of Beaver Creek, Gas Hills, Lander Slope, Red Canyon, and South Pass Management Units stated in the draft, as well as the Oregon/Worson Trail corridor, deserve designation as Areas of Critical Environmental Concern. We support Beaver Rim and Red Canyon as National Natural Landmarks, and South Pass as a National Register district.

We appreciate efforts to preserve historic structures and rock art. However, there remains a great need for further archaeological inventories across the resource area.

- 5 We call for maximum protection of crucial and critical wildlife ranges. We also advocate habitat improvement without the use of herbicides and fertilizers. Efforts to restore Bighorn sheep to their former homeland in Sweetwater Rocks, as mentioned in the NIP, would be an extremely valuable project.

Our comments for Sweetwater Rocks, Sweetwater Canyon, and Copper Mountain wilderness Study Areas are included in the accompanying position statement. All six areas, as well as Whiskey Mountain and Dubois Badlands, should be included in the National Wilderness Preservation System. We look forward to receiving the DPS for the latter two areas.

As BLM revises the Lander plan, we hope that non-commodity uses will be carefully appraised. Most of the resource area has already sustained a tremendous amount of exploitation and degradation. It is long past time for BLM to protect remaining wild areas and values, and to begin balanced multiple-use management.

Sincerely,

Lynn Kinter
Lynn Kinter
Director

cc: Senator David S. Nichols; Travel, Recreation, and Wildlife Committee
Representative Peg Shreve; Travel, Recreation, and Wildlife Committee
Congressman Richard Cheney
Senator Alan Simpson
Senator Malcolm Wallop



FRIENDS OF

WILD WYOMING DESERTS

P.O. Box 843, Lovell, WY 82431

8/10/82

"FRIENDS" CALLS ON NIM TO MEET ITS WILDERNESS MANDATE

The Lander Resource Area of central Wyoming has released a Draft Resource Management Plan/Environmental Impact Statement and a Wilderness Supplement for six Wilderness Study Areas. These WSAs total 48,000 acres--1.5 percent of the land managed by Lander Resource Area. To our disappointment, the Bureau of Land Management recommends designation for only part of Sweetwater Canyon WSA--5760 acres.

NIM states--and we wholeheartedly agree--that all the WSAs have exceptional wilderness values, outstanding opportunities for solitude and primitive recreation, and many special features.

Copper Mountain WSA--8000 acres of steep canyons and rocky slopes, has spectacular views and crucial deer and antelope winter range.

Sweetwater Canyon--5900 acres along Sweetwater River, provides critical habitat and elk winter range and "Class I" waters for wild brown, brook, and rainbow trout. Although they are not mentioned in the Draft, we have seen wild horses several times on the rolling hills above the canyon.

Sweetwater Rocks--a complex of four WSA totaling 38,175 acres--were frequented by Native Americans as long as 12,000 years ago, and by Oregon trail emigrants more recently. Huge granite domes in Sweetwater Rocks were landmarks for pioneers and now offer world class rock climbing.

Sweetwater Canyon and Sweetwater Rocks contain three raptorial types not represented in the National Wilderness Preservation System. According to the Draft, all the WSAs would be manageable as wilderness.

NIM addresses several concerns in the Draft RMP--but with peculiar logic. The first is that "designation would adversely affect mineral development." However, oil and gas potential in Sweetwater Canyon and Sweetwater Rocks has been rated as low to none, and US Geological Survey rated potential in Copper Mountain as low, although NIM rated it high. None of the areas have pre-PDMA oil and gas leases (valid rights predating October 22, 1976). Potential for development of other minerals is low in all six areas.

NIM also considers effects of designation on the livestock industry. According to the Draft, grazing would remain basically the same, and any vehicle restrictions would have little effect on management.

However, some of the private landowners near Sweetwater Rocks object to having a wilderness bordering their ranches. That appears the major--if not only--reason for failure to recommend this complex of national significance. The Draft actually states that designation for each area is expected to cause few, if any, socioeconomic impacts.

NIM is concerned that vehicle restrictions will limit recreation use. Yet Copper Mountain is unroaded, and short two-track ways total only 3 miles in each of the other two areas. Sweetwater Rocks access seems to be the main concern, since the complex is largely surrounded by state and private land. Visitors cannot drive to the boundaries on public roads, but can walk to them on public land. Currently, private citizens allow access across their land.

NIM also raises the issue of possible overuse due to wilderness classification. But this has never been the case in Wyoming. This is the weakest possible rationale, an obvious attempt to avoid meeting the clear mandate of law.

Congress has directed NIM to provide wilderness opportunities for the public. Friends of Wild Wyoming Deserts hereby requests, and urges, that Lander Resource Area revise the Resource Management Plan/Environmental Impact Statement to recommend designation for all six areas reviewed. Our members and supporters should communicate their feelings to Mr. Jack Kelly, Area Manager, Lander RA, PO Box 986, Lovell, WY 82431, and to members of Congress. We shall continue to monitor and report on developments. For the present we call on NIM and the Department of the Interior to respond in a positive manner.

February 13, 1988

Wyoming Farm Bureau Federation Comments on Lander Draft Resource Management Plan/EIS

The Wyoming Farm Bureau Recognizes the importance of the Resource Management Plan/Environmental Impact Statement and appreciates the opportunity to comment on it.

The Wyoming Farm Bureau is a general ag organization representing approximately 7,500 members of which about 2,500 are involved directly in agriculture.

Our comments are broken into two parts: Grazing and Wilderness

GRAZING

Our policies on how federal lands should be administered is quite explicit and comprehensive. The policies state:

Federal Lands

[1979-The Wyoming Farm Bureau supports the movement toward transferring the multiple use federal lands back to the ownership and control of the states.]

[1984-Farm Bureau has historically favored multiple use of the federal lands.]

[1979-Because of anticipated food and fiber shortages, we urge that forage production and utilization on federal lands and ranges be considered of prime importance as the multiple use principle of public land utilization.]

[1975-we favor sheep-wildlife fencing of public lands where necessary for proper grazing management.]

1 I would like to address the section of the grazing supplement listing alternatives first. Alternative D comes closest to meeting the requirements listed in the WFB's policy. Unfortunately this alternative was not "studied in detail" so it is difficult to make any comments on it. This alternative should definitely be looked at closer. None of the other alternatives fit our policy requirements as well.

2 The most closest alternative would be a modified Alternative B. Alternative B, with provisions for cooperative management agreements, would enable range resources to be used in a more cost effective way and improve range conditions also.

Alternative A and Alternative E both appear to be similar as far as major impact on agricultural users is concerned.

2 While the U.S. process may not be the worst to address management actions the process never-the-less needs improvement. As is currently the case, this process of allotment management plans, habitat management plans, etc., etc. prevents or seriously curbs any initiative to improve range conditions on the permittees part. This process needs to be streamlined.

Wyb Statement
Page 2

3 The statement: "Any range improvements that would occur under the 'Proposed Action' or alternatives would first be subjected to economic and environmental analysis. Adequate information to determine the economic benefits and environmental consequences would be collected before improvements are constructed."

could conflict with the statement on page seven which says:

"The funding for range improvements would be allocated to the Category I allotments first."

4 Privatization of fences according to regulations listed works well if a permittee runs cows. However what happens if range conditions could be improved by running sheep? This regulation almost guarantees that cattle will be run on federal lands if the permittee is given a choice. The preferred alternative or Alternative A has several problems associated with it.

5 Category I allotments would see a "13-19 percent" reduction in livestock grazing. However to reductions in other uses or users is mentioned. Are livestock people being singled out for cuts?

If in fact livestock people are to carry the burden of range condition improvements, then when range conditions do improve, livestock people should be the ones to give them this. Nothing is mentioned as to whether this would or would not occur.

In Factors 7 and 8 of Category I management allotments the "Objectives would be developed to ensure production to watershed soils, wildlife habitat, and vegetation." This statement shows a subjective bias towards some uses and elevates some users above others. This is inconsistent with the multiple use concept.

Under factor 4 Management Action of Category I land, exclusion of large grazing animals for several years might be necessary from riparian areas. Again, is this directed solely at livestock and if so why? If not, would there be methods available to exclude other consumers of range forage which are not mentioned?

On Factor 5 Management Actions, the management practice calls for "... (2) Temporary or permanent adjustments in stocking levels of livestock." Why not remedy the problem by adjustments of other forage users?

6 In the section of the Grazing E.I.S. entitled "Affected Environment" you list a definition for "riparian areas." This definition is very broad and could be subject to widely varying interpretation. Black's Law Dictionary gives definitions for riparian, which is different than the definition given in this E.I.S.

Because the definition for riparian given in this E.I.S. has very little basis in law and the actual definition could alter the meaning of riparian area, or, come, any reference to riparian in this E.I.S. should be removed.

Response to Letter 613

1. Alternative D was not considered in detail for the following reasons: The costs of extensive land treatments would be prohibitive and the benefits would be limited (costs would be more than three times greater, and benefits would be only 17 percent greater than under Alternative A), making this alternative economically infeasible. It would take more than 100 years before the objective of improving all range sites by one condition class would be attained (page 6 of the Draft Grazing Supplement).

Alternative B, with provisions for cooperative management agreements, could not be implemented due to the recent federal court ruling (Natural Resources Defense Council, Inc. et al. vs. Hodel et al.) which prevents the Bureau of Land Management from implementing cooperative management agreements (CMA's).

2. The primary objective of Allotment Management Plans (AMPs) or Habitat Management Plans (HMPs) is improvement in range condition. The Bureau of Land Management does not require a management plan for privately financed range improvements to be installed. Several operator initiated and operator financed improvements are constructed each year within the Lander Resource Area.

3. Category I allotments have been identified as having problem areas, and will therefore receive priority in funding over M and C category allotments. Economic analysis for projects in I category allotments can be found in Appendix B, Table B-8 of the Final Grazing Supplement. We see no conflict with these statements.

4. Control of sheep on federal range is usually accomplished by herding, not fencing. If the area of use (allotment) is well-known by the permittee, no fencing is really required to even mark the allotment boundary.

5. Livestock operators are not being singled out for grazing reductions as shown by the following management actions which would be applied to allotments that are not in satisfactory condition because of factors 1, 2 and 3; this includes 30 out of 38 allotments in the study area.

A. Adjust stocking levels of grazing animals. For livestock this might include both increases or decreases in livestock grazing, and for wildlife, increases or decreases might be proposed to the Wyoming Game and Fish Department.

7 The next question deals with the actual number of A.U.M.'s on the Lander Resource Area. On page 29 you list an estimated \$16,000 collected from operators. This amount divided by \$1.37 results in payment for 236,459 A.U.M.'s. On page 31 your estimates of A.U.M.'s per category allotments add up to 111,985 A.U.M.'s. On page 21, 119,128 A.U.M.'s are listed. This variation needs some explanation.

8 The last comment I have on the Grazing E.I.S. deals with costs of projects or more specifically, who pays. Several areas of the E.I.S. point out that range improvements benefit more than one user. If this is true, will other users be asked to share the costs of range improvements? If not perhaps this should be investigated as a method of doing more, sooner.

WILDERNESS

Wyoming Farm Bureau's position on wilderness is as follows:

[1977-The bureau ideal embodied in the Wilderness Act which provides for setting aside certain unique and pristine areas is certainly a commendable national goal. However, experience has shown that the "no management" concept applied to such areas under the Act has resulted in the serious degradation of the resource. A preponderance of evidence has demonstrated that the removal of all man-made facilities has resulted in sanitation and health problems that threaten the very essence that the Wilderness Act was designed to preserve.]

9 [1977-No one that established wilderness criteria further threaten such areas by prohibiting the employment of power tools and vehicles in watershed management, trail maintenance, soil treatment, noxious weed control, waste management, and fire protection. For these reasons, and the fact that wilderness management is inconsistent with sound multiple use principles, we oppose further expansions and urge reevaluation of all existing wilderness under the Act. Further, any future wilderness proposals should be subjected to environmental, social and economic impact analysis in addition to heavily weighted consideration of the views and land use plans of the residents in the locality and state concerned.]

[1978-We feel there are already adequate lands in Wyoming declared as wilderness and [1977-primitive] areas; therefore we oppose the designation of any additional lands as wilderness [1977-or primitive] areas or the expansion of grizzly bear habitat or other areas for endangered species.]

[1978-of additional lands are proposed as wilderness areas we favor thorough studies and investigations of the proposed areas] [1977-with weighted consideration given to the wishes of local.]

[1981-agricultural interests and past agricultural use.]

[1978-we recommend that local advisory boards of agricultural people from each area be formed for this reevaluation.]

The alternative which best supports this policy position is Alternative 1. There has been no demonstrable need for more wilderness in this area and in fact, the major issues and concerns listed in the Wilderness Supplement give ample reason for not proposing any lands as wilderness.

Wilderness designation discrimination against other B.L.W. users and goals against the principle of multiple use. Discrimination of this type has no place in government circles. If wilderness designation is approved for any of the areas then perhaps areas designation solely for grazing of large animals should be considered.

Sincerely,


Nan Hamilton
Research and Field Assistant

B. Additional forage available due to improved range conditions is allocated under existing grazing regulations (43 CFR 4110.3-1(c)(1)) which read as follows:

After consultation, cooperation and coordination, additional forage permanently available for livestock grazing use over and above the preference(s) of the permittee(s) or lessee(s) in an allotment may be allocated in the following priority to: (1) Permittee(s) or lessee(s) in proportion to their contribution or efforts which resulted in increased forage production.

C. Protecting the base resources by developing management objectives for watershed, soils, wildlife habitat and vegetation ensures the public land's capability to provide for multiple-use. It does not show a bias towards individual land uses.

D. Management action number 4, when implemented, will fence out riparian areas to eliminate the concentration of livestock, primarily cattle and wild horses (within the Green Mountain Study Area). Big game species, primarily elk, mule deer, and pronghorn antelope, are not causing significant damage to riparian areas within the Lander Resource Area (LRA). Refer to Chapter IV, under Environmental Consequences for Fisheries.

Control of livestock numbers is the most immediate and effective solution where land-use conflicts are causing a loss of forage production.

6. The meadow/riparian vegetative type described in the Affected Environment is not a definition of riparian areas. It is a discussion of vegetation that occurs in riparian areas. The unique character and importance of riparian areas requires special management considerations by BLM. The terms riparian and riparian areas as presently defined by BLM in the Glossary will be retained in the Final RMP/EIS.
7. The estimated 1984 grazing fee receipts of \$316,000 were collected from approximately 230,650 active licensed AUMs for the entire Lander Resource Area. The estimates on page 31 of the Draft Grazing Supplement are for the Gas Hills Study Area only and would not reflect the Lander Resource Area total. Estimated production may or may not equal licensed AUMs because of production fluctuations and not all the production is licensed for livestock grazing. The figure, 119,128 AUMs, on page 21 of the Draft Grazing Supplement, again only represents the total licensed AUMs in the Gas Hills Study Area.

8. Many range improvements are financed by range betterment funding. Many are financed by private users with interests in public land (livestock operators, Wyoming Game and Fish Department, One Shot Antelope Hunt, Water For Wildlife Program). Maintenance is assigned based on who the primary beneficiary will be from the project and in accordance with the Bureau of Land Management's Rangeland Improvement Policy.
9. Thank you for your comments.

Response to Letter 625

1. In the recent past, the BLM has been required to have legal access to timber sale areas before they could be offered for sale. Due to the fact that there is no legal access to our scattered timber stands, sales have not been offered.

The access requirement has been recently rescinded. Therefore, sales may be offered in the future to try to alleviate any timber supply or demand problems which may exist, and to undertake management of some of the BLM-administered timber stands.

In the last 11 years, this office has had some requests for firewood (about 20-25); however, there have been only three requests for sawlog material. These were requests for timber in specific areas and were refused due to environmental and access problems. There have been no requests in 4 or 5 years.

Most of the BLM-administered timber lands in the Dubois area are small, scattered tracts, mainly adjacent to U.S. Forest Service (USFS) lands. Many of these small tracts were cutover in the early 1960's. The ones that were not cut are only accessible through private or USFS lands. Many of these small tracts

625

United States
Department of
Agriculture

Forest
Service

Shoshone
National
Forest

205 W. Yellowstone Ave.
PO Box 2140
Cody, WY 82414

Reply To: 1920

Date: March 20, 1986

Mr. Jack Kelly
Lander Resource Area Manager
P.O. Box 593
Lander, Wyoming 82520

Dear Mr. Kelly:


Thank you for the opportunity to review the Lander Resource Management Plan and its accompanying EIS. In general, these documents are impressive and well done. There are a few points, however, that raise questions.

- 1 First, in the section dealing with demand for timber, it appears you have equated past consumption and demand. This does not conform to the economic definition of demand and may have led to an inappropriate conclusion regarding future demand trends. Currently there appears to be a large and largely unfulfilled demand for timber in the Dubois area. Combined with the Lander area it appears that quantities demanded exceed 30 MMBF at current stumpage prices. Given supplies projected from National Forests, State lands and from the Wind River Indian Reservation amount to no more than 10 MMBF to 14 MMBF, the demand for timber from the Lander Resource Area appears much higher than projected in your documents.
- 2 Second, there appears to be a lack of coordination on fire suppression strategies. I would suggest that you take a look at Appendix F of the Shoshone Forest Plan for lands bordering yours as a basis for such coordination.
- 3 Third, I would recommend that you include as management direction, site specific analysis and coordination of proposed disposal of lands. Some are adjacent to the National Forest or other public lands and it may serve the public best to retain these lands in public ownership.
- 4 Fourth, the Tappen Creek right-of-way discussed in your plan is not needed for management of the Shoshone National Forest. We are looking at an alternative to this to provide better access.

If you have any questions, please contact Tom Mitchell on my staff.

Stephen P. Meier
Stephen P. Meier,
Forest Supervisor

TMitchell/sjs



PS-820 (2-7-82)

contain so little timber that the value of it would not justify the expense of an easement through private lands, if one could be obtained.

In 1979, this office conducted a USFS Stage II inventory of this area. It showed a volume of about 14 million board feet (MMBF). Taking into account the inaccessible parcels and the timber on slopes too steep to log, an estimated volume of 10 MMBF or less is left to harvest. This is not enough to run the Louisiana-Pacific mill for half a year.

We will cooperate to lessen any problems in this area to the extent possible, but we will be able to do little with the limited resources available.

2. We have changed the recommendation for our Whiskey Mountain Management Unit to limited suppression to conform with the policy on adjacent USFS lands.

We understand from your Dubois office that most of the rest of the lands around the edge of the Dubois unit are in the timber base and have a policy of full suppression in a narrow band, then further back, the policy is limited suppression. This would conform to the recommended policy on most BLM-administered lands in the area.

Also, the BLM-administered lands are under a cooperative agreement with the USFS, whereby the Dubois office has initial attack responsibilities for these lands.

3. The RMP only provides general guidance and identifies parcels which may be disposed of. Disposals are still subject to site specific environmental assessment which would be the basis for a decision to retain or dispose of the parcels. Coordination with all interested parties would also occur at this time. All of the parcels identified in the plan that are adjacent to Shoshone National Forest were identified for retention because of the availability of access from National Forest lands. One exception was parcel 38 near Whiskey Mountain, which was identified for possible disposal, but only under very specific conditions which would result in a net benefit to management of bighorn sheep habitat.
4. Access to the BLM-administered public lands in the area constitutes sufficient public need and benefit to warrant the recommendation.

**Advisory
Council On
Historic
Preservation**

The Old Post Office Building
1100 Pennsylvania Avenue, N.W., #205
Washington, DC 20004

Reply to: 716 Stevens Street, Room 400
Golden, Colorado 80402

June 20, 1986

Mr. Jack Kelley
Lander Resource Area Manager
Bureau of Land Management
Highway 287 South
P.O. Box 330
Lander, WY 82520

RE: Draft Lander Resource Management Plan/Environmental Impact
Statement (RMP/EIS), Grazing Supplement, and Wilderness
Supplement

Dear Mr. Kelley:

We apologize for the delay in responding to your request for our
comments on the above documents.

- 1 We have reviewed these documents and are uncertain from the RMP
about the affirmative management actions that the Bureau intends
to take regarding the cultural resources identified in the RMP.
For instance, your cover letter identifies a second category of
effects, i.e., those cultural resources being affected or
impacted but for which planning will occur through subsequent
plans or procedures, but the RMP/EIS and the cover letter do not
identify what properties would fit this category. In the context
of this second category, we recommend that the Bureau develop
protection plans for many of its cultural resources, such as the
two structures at Gilespie Place/Radium Springs apparently being
maintained by grazing cattle, maintenance of the Bureau-owned
structures at South Pass Mining Area, of the flume at the Warm
Spring-Canyon Natural Bridge, Sparhawk Cabin, and the structures
at Sun Ranch, a National Historic Landmark.
- 2 We encourage the Bureau to adopt a planning approach to cultural
resources. We note the estimated 33 coverage of Class III survey
for cultural resources in the Resource Area. We encourage the
Bureau to assess the representativeness of these Class III
surveys, possibly suggested by additional sample surveys and
overview documents, for formulation of a predictive model of
cultural resource locations in the Lander Resource Area.

- 3 If the Preferred Actions in the Grazing supplement are adopted,
the Bureau should comply with Section 108 of the National
Historic Preservation Act through the Programmatic Memorandum of
Agreement (PMOA) regarding grazing and range management between
the Bureau, the National Conference of State Historic
Preservation Officers, and the Council. Use of the PMOA is based
on the completion of Class III surveys and consultation between
the Bureau and the Wyoming SHPO on means to avoid, minimize, or
mitigate the adverse effects of the range and grazing improvement
actions on National Register-eligible cultural resources. We
encourage the Bureau to look collectively at all contemplated
range and grazing improvement actions when planning actions to
avoid, minimize, or mitigate adverse on cultural resources.
Such actions analyzed collectively and optimally with use of a
predictive model could target areas of highest archeological site
density and parity of site types and affiliation, etc., to be
avoided in locating the needed grazing and range improvement
actions.

We hope that these comments are helpful. If you have any
questions or want to discuss this further, please contact Ms.
Marjorie Tingle at 303-236-3652 (commercial) or 773-3652 (FTS).

Sincerely,



Robert Fisk
Chief, Western Division of
Project Review

Response to Letter 629

1. Our cover letter requesting comments from
you stated that effects to cultural resources
would be caused from (1) direct RMP
planning decision effects, (2) effects covered
by subsequent plans or procedures, and (3)
continuation of present management. Re-
sources affected by categories one (1) and
three (3) were listed, but our cover letter did
not, as you pointed out, identify the specific
resources affected by the second category.
These category two responses and their
recommended management were discussed
in various places in the RMP, especially in
the Preferred Alternative Chapter. A summary
of resources affected by the second category
is listed here:

Resources under Present Management and
Protection Plans now being implemented in
accordance with the Lander RMP.

Oregon/Mormon Pioneer Trail (includes
Gilespie Place/Radium Spring, Burnt
Ranch, etc.).

Resources under Subsequent Management
and Protection Plans to be written and
implemented by the Cultural Resources
Management Program.

South Pass Historic Mining District
Castle Gardens Rock Art Site
Warm Spring Canyon Flume, Geyser, and
Natural Bridge

The other sites mentioned in your letter, the
Sparhawk Cabin and the Sun Ranch, are not
included in Category 2 because of the
following reasons:

Sparhawk Cabin - As discussed in the
RMP, we feel the cabin is adequately
protected and does not need any further
management at this time. Therefore, a
management plan for this resource is not
needed.

Sun Ranch - The structures at the Sun
Ranch lie on privately owned ground. No
acquisition measures, like those at Burnt
Ranch, are being proposed, so the RMP did
not consider those resources.

2. Predictive model formulation for cultural
resources is being pursued and studied by
BLM. Funding levels have not allowed much
sample survey-type work in the Lander
Resource Area, and at this point we feel we
need more data before attempting to predict
cultural resource site locations, densities,
types, etc., with any degree of reliability.
However, we plan on using our existing
inventory data base in the formulation of
future predictive models.

3. The Grazing Supplement of the Lander RMP is in accordance with your comments. Under the Consultation and Coordination Chapter of the Supplement, in the Wyoming State Historic Preservation Officer section, we state that the objectives and guidelines for implementation of the range management program would comply with the Programmatic Memorandum of Agreement (PMOA) regarding the Livestock Grazing and Range Improvement Program.

Response to Dubois Public Hearing

1. See general response to wilderness comments.
2. The RMP provides for prescribed burns in all management units because they can benefit several other resources and programs. Each management unit has been analyzed within the LRA and a Preferred Alternative recommended from an array of alternatives. Hopefully, the Preferred Alternative for each unit will become the approved plan.


Approximately one-half the land area will be managed under a limited suppression policy. This means that specific plans for each management unit will be prepared and utilized when fires occur. Each fire will be evaluated and an appropriate control policy undertaken.

The main reason that the whole area is not designated for limited suppression is that there is a variable land status pattern, with much private and state land scattered throughout the area. BLM is obligated to control fires which start on BLM-administered lands and which threaten private or state lands.

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BEFORE THE BUREAU OF LAND MANAGEMENT

IN THE MATTER OF A PUBLIC HEARING CONCERNING THE
LANDER RESOURCE MANAGEMENT PLAN AND THE WILDERNESS
STUDY WITHIN THE BAKING DISTRICT, ENCOMPASSING THE
LANDER RESOURCE AREA



TRANSCRIPT OF HEARING PROCEEDINGS

Transcript of Hearing Proceedings on the
above-entitled matter on the 11th day of December
1985, at the hour of 7:00 p.m., at the Dubois Town
Hall, Dubois, Wyoming, Mr. Tim Monroe presiding.

FOOTNOTES

EXHIBITS

REMARKS

APPENDIX

WYOMING DEPARTMENT OF LAND MANAGEMENT

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CHEYENNE, WYOMING 82001

303.635.1231

2000 N. 10TH ST.

CHEYENNE, WYOMING 82001

303.635.1231

PROCEEDINGS

HEARING OFFICER MONROE: Well, it's the

appointed hour and the hearing will come to order.

Let me introduce myself. I am Tim Monroe, the district manager from Casper, and I have been appointed by the state director to be the hearing officer tonight, a hearing concerning the Lander resource management plan and environmental impact statement and the wilderness study areas within the Rawlins District encompassing the Lander Resource Area.

Most of you signed the attendance sheets. I think all four of you did as you came in. And if you would like to make a statement, be sure and check that space on the list or somehow make your intentions known to us.

The official reporter tonight is Jack Wala of Wyoming Reporting Service in Casper. He will prepare a verbatim transcript of everything that's said in the hearing. And if you wish to obtain a copy of it, you can contact Jack tonight or later at your conveniences.

The hearing is being held to obtain comments on the preferred plan for the Lander Resource Area, including recommendations regarding six wilderness

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We have provided for the option of utilizing prescribed burns in the entire LRA if they have the potential to enhance the resources.

3. The RMP is generally intended to guide management actions for the next 10 years. However, the RMP can be amended at any time to address the impacts and the desirability of new proposals for the benefit of the resources and the public. Any such amendment would be required to go through public participation, interagency coordination, and consistency requirements again regardless of the significance of the environmental impacts.

4. The RMP was coordinated with other federal, state and local governmental agencies as listed in Chapter VI, Consultation and Coordination. The Forest Service's Shoshone Forest Plan was reviewed for consistency where Forest Service and BLM-administered lands adjoin, and every effort was made to assure such consistency was achieved. Through comments such as yours, we did find an inconsistency in the fire management recommendation for adjoining Forest Service and BLM-administered lands in the Whiskey Mountain Management Unit. A change has been made in the Final RMP/EIS to manage this unit under the limited suppression policy.

The proposed land interchange between the Forest Service and the BLM is still a possibility. The proposal has been forwarded to Congress. The potential area that would be affected in the Lander Resource Area covered by this plan would generally be the Lander Slope and the Dubois area which would be transferred to the Forest Service.

study areas. A draft resource management plan and environmental impact statement on the subject has been published and is available in the room or outside, if anyone wants a copy to take with them.

A few words about our procedure tonight: The hearing is not a debate, a trial or a question-and-answer session. It's an advisory hearing required by law and regulations and all interested persons may present statements either written or oral or both or other information pertinent to the RMP, including the wilderness study areas we are considering tonight.

There will be no cross-examination from the audience, but if anyone doesn't understand the statement of a speaker or you need to make a clarifying question, just refer that question to us and we will determine whether or not it's pertinent and see if we can get an answer. This does seem kind of overly formal, but it's intended to give everyone a fair and reasonable opportunity to present their views.

Any written statements in addition to oral statements will be included in the full transcript and will be considered on the same basis as spoken statements. You may also submit written comments

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until February 14, 1984. And those will be included in the formal hearing record and be considered fully. Any comments should be addressed to Jack Kelly, the area manager, Bureau of Land Management -- Jack is sitting here -- Box 569 in Lander, 82520, or to Gene Volkman, who is the team leader on the plan, at Box 670 in Hawlins, 82301.

The hearing will begin now and we will offer the floor to anyone who would wish to make a statement.

(No response.)

UNIDENTIFIED SPEAKER: This must be off the record, but I am not prepared to make an oral statement at this time. But I am planning to make a written comment at a later date. I am just not prepared to make a statement at this time.

HEARING OFFICER MCGRUE: He's not?

MS. HICKS: I didn't realize this was a public hearing.

HEAR. MC OFFICER MCGRUE: You are in the right hearing.

MS. HICKS: Yeah, I am in the right one. I have some opinions on both areas.

UNIDENTIFIED SPEAKER: I come to listen. I didn't come to testify. I plan to do that later.

SEVEN
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WASHINGTON, D.C. 20250

HEARING OFFICER MCGRUE: Would you prefer to send in a written statement then, a formal statement?

UNIDENTIFIED SPEAKER: Yes.

HEARING OFFICER MCGRUE: By the 14th of February. Fine. That will be welcome. And it's given the same weight as presenting testimony.

MS. HICKS: There is going to be no presentation by the BLM tonight?

HEARING OFFICER MCGRUE: Not the hearing part of it. It's a two-part hearing. The hearing is on the RMP and EIS, the regional management plan and environmental impact statement. Following the hearing will be a scoping meeting on the two additional wilderness study areas that have been added as a result of litigation. So they have to do some supplemental preparation of documents and analyses, studies, that sort of thing on two new WSAs. I suspect that's what you're primarily interested in.

MS. HICKS: Yeah. But, you know, if nobody says anything, that means that the hearing record records that nobody in Dubois had anything to say?

HEARING OFFICER MCGRUE: During the hearing. But the record is open until February the

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1 14th for supplemental information or plain new
2 statements.

3 MR. HICKS: I feel uneasy about that.

4 MR. STORY: As I understand the
5 supplement -- I have read it all, but there is so
6 much volume of information, that I didn't get -- I am
7 not sure that I retained all of it.

8 HEARING OFFICER MORRIS: Sir, excuse me.
9 Could you identify yourself?

10 MR. STORY: I am John Story. I manage
11 ranches for Parker Land and Cattle Company. And as I
12 read it, basically the entire thing is that there is
13 not really going to be much change from what -- you
14 know, no drastic changes anyway in the plan. I don't
15 really know whether that's good or bad. So I am
16 going to just reserve my comments and see what else
17 happens.

18 I really am more interested in the two new
19 proposals -- not new proposals, but reinstated
20 proposals to hear what's going to happen or go on
21 there. I have some mixed feelings about the
22 establishment of rules and guidelines for
23 establishing a wilderness area and then just as soon
24 as that doesn't fit some special interest group's own
25 idea, well, then they can change their criteria. I

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1 don't think that's correct.

2 HEARING OFFICER MORRIS: You mean the
3 study criteria?

4 MR. STORY: No -- well, yeah, but on
5 the whole criteria for setting up these isolated
6 spots for wilderness consideration, because neither
7 one of those fit the criteria and I don't -- you know,
8 I can't see where special interest groups can come in
9 and change the criteria to fit their own halfwick.

10 MR. HICKS: I don't know. I think I
11 ought to identify myself. My name is Leslie Hicks and
12 I am a Sierra Club member and I am a member of the
13 Wyoming Wildlife Federation. And I fully agree with
14 the interests of John Story, and I am very much in
15 favor of the grazing. But I also support wilderness
16 and I do think that at least the badlands qualify for
17 wilderness. And I am very interested in hearing what
18 you have to say about it.

19 HEARING OFFICER MORRIS: Sir, we have
20 already opened the hearing, and the time is now for
21 anyone wishing to make a statement on the draft
22 resource management plan and environmental impact
23 statement. I know you just came in out of the cold,
24 so to speak, literally. We would sure welcome
25 anything you had to say on it.

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1 MR. BENSON: I would like to --
2 HEARING OFFICER MONROE: Would you
3 identify yourself, please?

4 MR. BENSON: Yeah. My name is Scott
5 Benson. I am here in Dubois. I would like to know
6 why the BLM seems so afraid of prescribed fires.
7 HEARING OFFICER MONROE: Well, as I
8 explained during the opening remarks, which
9 unfortunately you missed, this is a hearing to
10 receive testimony and not a meeting that we would
11 normally have to have a dialogue on issues related to
12 federal land management. I know we can answer that
13 question after the hearing part of this is over,
14 which probably won't be much longer.

15 Jack Kelly, the area manager here, Dick
16 Heston, the district manager for the Rawlins District
17 is also with us, and I know they can answer your
18 question.

19 MR. BENSON: Okay.

20 HEARING OFFICER MONROE: Did you have
21 any comments on the -- to turn that around a little
22 bit, did you have comments on areas or methods or the
23 need for burning?

24 MR. BENSON: Yeah. I think alternative
25 need for management of fire management should be the

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1 preferred alternative.

2 HEARING OFFICER MONROE: Is your
3 interest based on rangeland management needs or
4 improvement of wildlife habitat, or what's your
5 interest?

6 MR. BENSON: Well, I think BLM should
7 be a professional land management agency. As such,
8 they shouldn't take the attitude that all fires are
9 bad when I think everybody is aware that some fires
10 in certain areas will benefit wildlife. They will
11 benefit the rangeland. I think they should approach
12 it with that attitude.

13 HEARING OFFICER MONROE: The gentleman
14 here in the mardon sweater, did you care to make a
15 statement?

16 UNIDENTIFIED SPEAKER: No. I just came
17 to listen. I am going to send in written comments.

18 HEARING OFFICER MONROE: Did you hear
19 that the record is open until February 14th --

20 UNIDENTIFIED SPEAKER: No.

21 HEARING OFFICER MONROE: -- for written
22 comments? Yes, it's a 90-day comment period.

23 UNIDENTIFIED SPEAKER: What is the
24 difference in the value placed on the public hearing
25 comments versus the written comments?

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HEARING OFFICER MONROE: Now, both types of comments are given full consideration and full utilization. I realize that at this time and the way the weather is, it's hard for people to get into town or get out to public hearings or even take the time to read the material ahead of time.

Mr. Mastin, do you want to recess the hearing in case somebody else comes in and then go into your closing part of it?

MR. MASTIN: Unless someone else has formal statements to make, I recommend we close the formal part of the hearing and we will be available for some questions and answers on the RMP, unless anybody on the panel has any questions.

MR. KELLY: I would like to respond to some of the points that have been raised.

MR. MASTIN: Once we close the hearing, we can do that.

MR. REMSON: I would like to ask one final question before we get started. How much of this plan -- by reading through it, it seems a lot of it is still up in the air after this plan has been initiated. How much can be changed at the discretion of a regional director or state director? Are you going to stick by this plan or is this going to be

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followed for the next 30 years, or as a new director comes in, will things change with him?

HEARING OFFICER MONROE: The way the procedures are, you go through a draft plan. Then you do the final plan. Then you take the comments that are received, or say a protest comes in on the final plan or something like this, and you issue a record of decision after the comment period is closed on the final plan. And that sets forth based on all the public comments and all other sources of information the final planning decisions. And that record of decision is the management prescription for a number of years, basically ten years, ten to fifteen years, although plans can be modified or amended during that process.

There is a formal procedure for modifying or amending the land use plan. And you say the state director or another person can come in and change it, only through a prescribed process that would modify the plan or amend it in an open atmosphere. The plan carries a lot of weight in the way the statute is written that calls for land use planning and the way plans are developed and then approved and administered.

So there is quite a program there that both

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the Forest Service and BLM are pretty much on parallel tracks on it. Our laws are very similar and regulations are very similar.

MR. BENSON: That brings up another question as to how much integration was there in formulating this plan as compared to the Forest Service Shoshoni Forest plan that just came out. It seems that certain areas there is a lot of discrepancies to neighboring pieces of land. They're managing it one way and you are managing it another way. And the proposal is still, I believe, for land trades with the Forest Service.

HEARING OFFICER MONROE: Yes, the interchange is an issue that would be dealt with. And I know what we have done in our district in Casper is identify areas that are available for disposal, which means sale or exchange, long-term leases, this kind of thing, well, mostly sale or exchange. And I don't know. I am sure by the final -- when the final plan comes out, they will have considered those type of things. We are required by law to have a certain level of consistency with plans of Indian tribes, state and local government, this sort of thing.

If there is no further comments, we will



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close the hearing, subject to reopening it if some people arrive, and go into the scoping session. We can hold it for another twenty minutes or so; and if no one else shows up with a statement, why, we will be closed at that time.

Thank you.

(Hearing proceedings adjourned
7:15 p.m., December 11, 1985.)



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C E R T I F I C A T E

I, JOHN E. WALLS, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 14 pages constitute a full, true and correct transcript.

Dated this 31st day of December, 1985.

John E. Walls
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Response to Lander Public Hearing

1. We feel that the balance is provided in total management prescription for the area including the restrictions or stipulations that will be imposed upon the development-type actions you mention. These will protect other resource values without prohibiting the recommended consumptive uses and consequent public benefits.
2. See general response to wilderness comments.
3. See Response 1 to Letter 15.
4. Timber sales or timber management activities including road building activities on forested lands are subject to planning, environmental assessment of impacts and coordination with WGFD, the same as other program projects. Consideration of the WGFD's concerns is incorporated into these project plans.

Outside the forested lands, road densities vary widely. In some development areas, i.e., oil fields, road densities are still expanding, while in other areas, densities are stable and are primarily the result of historic use patterns. We feel we have analyzed the effects of most new road building on wildlife as part of the analysis of surface disturbing habitat loss,

BEFORE THE BUREAU OF LAND MANAGEMENT

IN THE MATTER OF A PUBLIC HEARING CONCERNING THE LANDER RESOURCE MANAGEMENT PLAN AND THE WILDERNESS STUDY WITHIN THE HANLINS DISTRICT, ENCOMPASSING THE LANDER RESOURCE AREA

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TRANSCRIPT OF HEARING PROCEEDINGS

Transcript of Hearing Proceedings on the above-entitled matter on the 12th day of December 1985, at the hour of 7:00 p.m., at the Lander High School, Lander, Wyoming, Mr. Tim Hanson presiding.

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HEARING OFFICER MORRIS: Good evening.

ladies and gentlemen -- gentlemen. The public hearing will now come to order.

Let me introduce myself. I am Tim Morris, the district manager from Casper, BLM, and I have been asked by the state director to come over and chair this hearing.

The purpose of the hearing is concerning the Lander resource management plan and wilderness study reports within the Rowles District which encompasses the Lander Resource Area.

You have all signed the attendance sheets as you came into the room. But if there is anyone that didn't sign up, we would appreciate you doing it if you plan to make a statement. There is one person here that has an X by his name, and that person will be called upon to make his statement that he or she wishes to offer.

The official reporter tonight is Jack Wais of Wyoming Reporting Service in Casper. He will prepare a verbatim transcript of everything that's said tonight. If you wish to obtain a copy of the transcript, please contact Jack and make your arrangements directly with him.



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The hearing is being held to obtain comments on the preferred plan for the Lander Resource Area which includes recommendations for six wilderness study areas. A draft resource management plan and environmental impact statement has been prepared and is available in the room if anyone wants a copy. There are some on the table right there.

A few words about our procedure tonight. This is a hearing as opposed to the normal BLM public meeting. The hearing is not a debate. It's not a trial. It's not a question-and-answer session. It's an advisory hearing. And all interested persons are asked to present their statements or their comments, either written or oral or both, or information pertinent to the draft resource management plan, including the wilderness study areas that we are considering.

There will be no cross-examination from the audience or from myself or the panel members that are here. We are simply here to receive your information and learn what we can about your views on the resource management plan and the environmental impact statement.

This does really seem overly formal. But it's intended to give everyone an opportunity to



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stress and displacement impacts associated with oil and gas development and mining industries. These activities account for the majority of the new road development.

5. The LRA has had NSO stipulations on the Oregon/Mormon Pioneer Trail corridor for about eight years, and the Preferred Alternative of the RMP would continue this management practice. This type of management, backed up by planning decisions, has successfully protected the trail corridor in the past, and we believe this protection will continue in the future.
6. The proposed increase in timber harvest in the LRA is an attempt to salvage the dead and dying timber and bring the resource under intensive management, to provide a resource to the local economy and try to improve wildlife habitat.

In the last year, the Green Mountain area has experienced a 50 percent or more decrease in firewood sales. This is due mainly to the lack of access in the area. In the fall of 1982, 12 roads were closed on top of the mountain. These were roads to areas that have had most of the firewood removed. Almost all roads that have been opened for timber sales over the years have been permanently closed. The policy on the mountain is to leave logging roads open for one or two years after a timber sale is completed, to give the firewood cutters a chance to remove the available firewood, then close the road.

7. The Preferred Alternative of the Final RMP/EIS increased the number of acres available for oil and gas leasing by about 94,000 over the acreage available for leasing under Alternative A, the present management situation. The majority of the increased acreage is in the low potential category. Because the number of acres would increase by about 3 percent of low potential areas and the majority of the acreage within the LRA is already leased, we certainly would not expect an oil and gas boom, "something that's going to rival Evanston." For these reasons, an extensive socioeconomic analyses based on boom condition of oil and gas leasing and development was not done. Should these conditions ever arise, we would do the necessary National Environmental Protection Act (NEPA) documents and amend the plan accordingly.
8. See general response to wilderness comments.
9. According to statistics presented in the Oil and Gas Journal published in July, 1985, through January, 1986, the U.S. imports an average of about 36 percent of its crude oil. Of course this figure varies, but imports are

1 present their views in a nonadversary situation.
2 Anyone wishing to submit a written statement may do
3 so and written statements will be included in the
4 transcript and considered on the same basis as oral
5 comments.

6 The hearing record is open until February
7 14th, 1986. And any person who after tonight's
8 hearing desires to get more information and submit
9 written comments, they will be accepted through
10 February 14th and given equal weight to anyone who
11 took the time to come out here and speak or any other
12 comments we receive on it. Comments should be
13 addressed to Jack Kelly, the area manager -- Jack is
14 over at the end of the table here -- to the BLM here
15 in Casper or to Gene Kolkman. Gene is on the other
16 end. And they are surrounding Bob Tigner from the
17 Rawlins district office. Send the comments to Gene
18 Kolkman if you care to.

19 The hearing will now begin and we will hear
20 from the first witness, Mr. Mike Massie. Welcome,
21 sir.

22 MR. MASSIE: First comment: You need a
23 higher podium. I am sorry I am the only one talking
24 tonight. I hope I am not keeping anyone here.

25 My name is Mike Massie and I live in South

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presently below 50 percent. The present reserves of domestic oil are being depleted and are not being replenished with new reserves. BLM's policy is to make available public lands for exploration for and development of new reserves of oil and gas. We feel the Preferred Alternative of the RMP makes the public lands available.

10. See general response to wilderness comments.

1 Park City, Wyoming. And I am chairman of the Wyoming
2 chapter of the Sierra Club, and I represent about, oh,
3 approximately 600 members who live here in Wyoming.
4 And I would like to briefly talk about the resource
5 management plan, a little bit more specifically about
6 the wilderness part of that particular plan.

7 I would like to address four points but just
8 in a general fashion. A lot of the details, a lot of
9 the specifics I will just put into the written record
10 and submit that before February 14th.

11 The RMP contains a few good points but I
12 believe that there are several weaknesses in the plan.
13 First of all, the BLM and in a lot of its publicity
14 throughout the years has expressed or has listed a
15 balanced management approach or generally a multiple-
16 use approach. And there is nothing wrong with that
17 if that's obtainable.

18 It's definitely an abstract concept and it's
19 not always obtainable. But I think it can be here in
20 the Lander Resource Area. But the draft RMP sort of
21 declares some myth that the BLM is trying to reach in
22 balanced management of the plan. It's heavily
23 dominated by oil and gas, timbering and grazing.

24 Now, grazing has been going on here in this
25 particular state for over a hundred years. And for

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the most part, ranchers have shown that they can manage the land quite well, especially in the cooperative relationship with the land management agency. So I would like to focus on the oil and gas and timbering and show the premise that these sort of things are really out of balance in the RMP.

Essentially the best illustration is essentially the facts. There is a proposal of approximately six million board feet per year that are supposed to be cut. The RMP also proposes 2.4 million acres for oil and gas development, yet at the same time proposes 5,700 acres for primitive recreation and wilderness. What to me is just not a balance.

On the wilderness question, many other of the resource areas in Wyoming have already given their wilderness recommendations and they are much like the one here in Lander. For instance, the BLM down in Rock Springs recommended only one and a half acres out of 13. So far, here in the Rawlins District, combined with the other resource area, it's about one and a half out of eight with two more still to be studied. In Casper, there are no recommendations for wilderness study areas out of the ones they have had up there. And the same with



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So essentially what that comes down to, out of 20 NSAs that have been looked at so far, three have been recommended for wilderness. So this plan is definitely keeping with that.

In fact, if you look at the oil and gas recommendations for leasing as opposed to what's recommended for wilderness, a hundred percent of the land in this resource area is recommended for oil and gas leasing. One-tenth of 1 percent is recommended to preserve its natural characteristics.

Essentially, what means a thousand times more land will be devoted to oil and gas development or at least leasing than it will be for the preservation of this area's unique beauty. This isn't balanced. This to me is not multiple use. And in fact, there are more uses in wilderness than you can get by going out and poking a hole in the ground or clearcutting an area.

I object to the wording in the alternative. Several times the recommended or the preferred Alternative is continuation of present management. Essentially that means not designating the area for wilderness. It's nonwilderness use. But if you look at the use of the area in the past, since the earth



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was created, that area has been roadless. That's why it's a wilderness study area. The wilderness characteristics are there. They have not been touched by oil and gas development and timbering. That's why it's a wilderness study area.

So if you are going to continue management of it and you're going to continue this type of land use, that is wilderness. I think they were just trying to present some kind of image to the public that by continuing present management, they aren't out there to change anything; whereas, if they really want to do as is recommended, that is, lease for oil and gas and make it nonwilderness, that is the change, not keeping it for wilderness.

Now, in the specification areas, Sweetwater Canyon, now, I gather from reading the wilderness supplement that the reason for leaving out approximately 1,000 acres and recommending 5700 acres for wilderness but leaving the 1,000 acres out is because it conflicts with motorized vehicles, but the study is not clear as to who uses these motorized vehicles.

It sort of alludes a little bit to ranchers in there. But other places it alludes to people who go in there and fish and who go in there to hunt or



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people who just like to go in there in their Jeep or whatever and run all over the place. So it's not specific as to why these 1,000 acres were thrown out and what user group will be using the area for use by motorized vehicles.

If you look at ORVs, they can use pretty much all of the lands throughout the BLM area. And there are legitimate uses for ORVs on BLM land. But if you look at the thousands and possibly millions of acres in the resource area that ORVs can use, taking in another 1,000 and putting it in wilderness designation isn't going to make that much difference. And as far as rancher use, as the study also pointed out, there are only two grazing allotments in this WSA. One of them has 1 percent of the allotment in the WSA. The other one has 12 percent.

So I don't think motorized use in that area is going to hurt grazing allotments that much. So I don't know why these 1,000 acres have been excluded. On the other hand, they are important to preserve the integrity of the area.

As the BLM admits in the study, the WSA has great fishing, excellent solitude and natural features. So you would have a greater positive impact on these area's society as a wilderness than anything



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else. That's pretty strong language. Why doesn't that jibe with the recommendation? I think the entire area should be preserved as wilderness.

By the way, the only area which is recommended for wilderness, the 5700 acres, is on steep canyons and you can't drive a vehicle up it. I don't think too many cows can graze up it. You can't puncture a hole in it and you can't timber it. So there isn't much of a compromise. There isn't anything to do with it but make it a wilderness.

Sweetwater Rocks, once again, the purpose of the wilderness review is to look at an area's solitude, to look at the area's potential for recreation. And the BLM admits that Sweetwater Rocks has excellent potential for this, both solitude and recreational values. Why isn't it wilderness?

Once again, it's not really clear as to why it's not wilderness. In one part of the study, sort of buried away, are some objections by some of the ranchers who work in the area. One of the objections is that wilderness designation would bring more people into the area. This a lot of people refer to as sort of a moon light syndrome; that is, as soon as something is made wilderness, people are going to find out about it all over the area and come into the



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area.

Now, that may have some legitimacy in certain forest land, say, around Yellowstone Park. It's not going to have legitimacy around an area that is much smaller. In addition, the study admits people that use the area are almost entirely dependent on Jeffrey City. And considering that population has gone down, less people are using it lately. So making it wilderness will not bring a lot of new people into this area.

Another one of the objections is it will affect their life-style. Well, it's wilderness now. People use it because of its primitive setting and I don't think that's going to change with wilderness.

But look at the alternative. The BLM would like to make this an GNV area and advertise it as such. You know, if the people in the area are worried about some pine needle junkies coming into the area and destroying the land, they are really going to have a lot of problems with GNV people coming into there. They are notorious for not staying on the road. They are also going to bring vehicles into this area, not just backpacking.

So if it's going to affect the life-style and bring more people into the area, actually, the



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plan of making it an ORV area is going to do that.
The area definitely deserves wilderness designation.
It's a unique area and you are just not going to find
that kind of setting anywhere else in Wyoming.

Finally, Copper Mountain: The proposal is
to open up this area for ORV and oil and gas use, but
there is really not a detailed study of what kind of
impacts oil and gas use and ORV use are going to have
on this area. It is admitted that wildlife are going
to be adversely affected and there are many more
roads built because of oil and gas development,
especially on the southern part of Copper Mountain.

At the same time, BLM says they are going to
improve wildlife habitat up there too. You can't do
both. You can't expect an increase in the deer herd
and elk herd in the Copper Mountain WSA if you are
going to also go in there with oil and gas
development and have a road too. You can't do both.
That's why more studies need to be done.

There is no study of the recreational
potential of Copper Mountain. Copper Mountain is
right next to Boysen State Park which has an annual
attendance of about 200,000 people a year. In
addition, it's right next to the Elk Creek Mountain,
which also has an outstanding recreational potential.



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So while oil and gas development in the southern part
is high, so is the recreational part, too.

In summing up the wilderness recommendation,
these are the only vestiges we have left or only
means we have of preserving the important parts of
the Lander Resource Area in its natural habitat. To
environmentalists, they're important areas. It's
like the Sierra Club coming in and telling them to
close down the Gas Hills for no particular reason at
all, just close it down because we want to make it
natural.

Now, we will never say anything like that.
But for the reasons that we are closing down what we
perceive as our Gas Hills, our real important
Wilderness Areas, there really aren't any good
reasons for doing that. There really aren't any land
use conflicts, or land use conflicts that can't be
worked out. You know, they are the only vestiges
that are left. Let's preserve them. They are
important to be preserved.

On oil and gas leasing, very quickly, once
again, the proposal is to lease a hundred percent of
the area. We do not have any problems with oil and
gas development in Lander Resource Area. That's fine.
We do have a problem with all of the land being



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leased and developed pretty much. We think that there are conflicts out there and resources that should be protected that will be impacted by oil and gas development.

One of the problems with the study is its reliance on surface occupancy stipulations. Essentially, that means if you have a lease and if you want the oil, you have got to find some other way of getting it out of there rather than going on that land physically and doing it.

That sounds okay and that sounds like a way of protecting what's up on top. And if the oil companies have a way directly of getting that gas out of the land by angle drilling or other types of means, then that's fine. But there is a lot of areas where they are not going to be able to do that. And it has been shown in other cases where these oil companies can go back in and get those surface stipulations dropped. They can remove that surface occupancy stipulation somewhere down the line.

So there is no guarantee. So if you have an area that has surface occupancy, you think it's going to preserve its natural integrity or the route of the Oregon Trail, it does not guarantee it.

In addition, while there has not been a

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court challenge of MGOs or no surface occupancy stipulations, there certainly can be in the future. Some people, some legal companies who represent oil companies think that there may be a good challenge there.

In addition, oil and gas leasing, as the study also admits, is going to have an adverse effect over big game over the next 40 years. Big game now is fighting for survival and BLM is important. A lot of people sort of perceive some of these rocks as sterile. There is some important wildlife habitat, in fact, quite a bit.

If the Yellowstone National Park and Grand Teton National Park go ahead and protect all that wildlife after all the Forest Service works hard to protect all their wildlife, it can still be jeopardized by what happens on BLM lands.

There are some critical wildlife corridors as well as summer and winter habitats and they are certainly in the Land Resource Area. I think those areas need to be withdrawn from leasing, oil and gas leasing.

Seasonal stipulations to protect the wildlife doesn't really happen, especially if there is roads there. If a company puts a road in in order

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3 to protect a lease and they have leases there, other
4 people can still use the roads and disrupt the
5 habitat.

6 In fact, the Game and Fish has pretty much
7 espoused the idea that if you have about two miles
8 per square mile of road, two miles of road per square
9 mile of forest lands, then you are going to have an
10 adverse effect on the elk.

11 That's probably even more true on BLM land.
12 And that's one thing which I feel is one of the
13 weakest parts of the study is it doesn't look at the
14 impact of roads on wildlife. And seasonal
15 stipulations will not get rid of these roads and
16 their impact.

17 Finally, certain areas of real sensitive
18 nature in the Lander Resource Area should be
19 withdrawn from oil and gas leasing all together.
20 That includes the Oregon Trail, Mormon Trail Corridor.
21 There is no reason to develop that stuff. The Oregon
22 Trail and Mormon Trail is definitely worth preserving.

23 South Pass Mining District: Even though
24 there are no surface occupancy stipulations, once
25 again on those things, there is no guarantee for the
26 future. Obviously, all wilderness areas, we do not
27 believe that those should be leased, and important



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1 wildlife areas, especially elk, sheep, deer and
2 antelope areas and the natural and recreational areas.
3 There will still be plenty out there to lease for oil
4 and gas development. In other words, we need to
5 protect these other resources.

6 For timbering, timbering causes some real
7 concern on the Green Mountain area. In fact, I am
8 concerned about Green Mountain altogether. There
9 seems to be an awful lot of oil and gas leasing
10 that's going to be up there as well as an increase in
11 timbering, from 750,000 board feet per year to 2.2
12 million. That's about a big increase in timbering.
13 And once again, there is no analysis of impacts that
14 roads are going to bring up there. But nevertheless,
15 Green Mountain has quite a bit of wildlife up there
16 as well as scenic beauty and there is no analysis as
17 to exactly what kind of effect it is going to have on
18 the wildlife herds in this RMP.

19 So I would suggest keeping the present board
20 feet and also to looking to removing some oil and gas
21 leasing from the area that's affected to protect the
22 wilderness. The six million board feet or generally
23 what the Lander Resource Area is going to shoot for
24 is pretty large. I think that should be reduced also,
25 especially in the Green Mountain, Dubois area and the



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Lander slope. I think that is over -- is going to be overtimbered.

Now, I think that one part of the study is good in that it shows what the various demands for timber is going to be. And timbering to provide for the local economy, local companies, is fine. But the BLM should not be a reservoir for the large companies to come in here and take out so much wood. Once again, like the Forest Service study, timbering does not benefit wildlife. And that is found throughout the study. When timbering benefits wildlife is when you have a large forest area that doesn't have much open spaces. Then timbering can do it. But I don't think there is any here in the BLM land that is so forested that you have to go in and clearcut it to open up some forest. And it isn't on the Green Mountain. Presently, those conditions aren't present. And once again, roads can have a major impact on it.

Now, what are the positive aspects? I think that the RMP is very good on the South Pass Mining District and the Oregon Trail. The South Pass mining area is one of the most historic areas in Wyoming. And this plan does a good job of protecting that. It asks for mining plans from the miners who are going to be working in the area while at the same time



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doesn't cut back in the historical use of the area. Mining is a legitimate use of that area.

It also protects the historical use resources. And even though my own quibble is the more surface occupancy stipulation on the mining, I think if those things are stuck to by the BLM, then I think that area will be preserved, the same with the Oregon Trail. And it's important to preserve those cultural resources. In fact, of all of RMPs I have read, this is by far the best on cultural resources.

Concluding -- finally, right? -- the RMP needs more balance. It needs more primitive recreation. It needs more wilderness areas. It needs less oil and gas use. All of these are legitimate uses of BLM land but they should be coming closer to the balance.

In addition, this study does not really look at what this grandiose plan, the Lander Resource Area, the impact it's going to have on the area's towns. You know, if 2.4 million acres is leased and even a small fraction of that starts to get developed, you're going to have a big oil and gas boom in this area, something that's going to rival Evanston. If there is no impact as to what that's going to do on the social ties here in Lander, even Atlantic City,



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South Pass City, Riverton or Dubola or any of those other areas, they will have an impact on the town. This is important to study, too, because towns don't depend strictly upon oil and gas development or timbering or even recreation. It's a balanced approach. And this resource management plan has to be balanced, too. And it has to look at those impacts on those towns. It's very important. And because of that, because it's so heavily balanced toward development, there really isn't any kind of Wyoming characteristics in this plan.

You can take this plan and apply it to New Jersey. If you were to take the cover off of this thing, you can look at it and it would almost look like you could be doing the same thing in New Jersey or Pennsylvania or someplace like that. There is no Wyoming characteristics in here.

And one of the Wyoming characteristics that I feel strongly about is quality of life. Quantity is important. Jobs are important. But so is quality. The people that live here, what kind of recreational opportunities do they have? What kind of freedom do they have? Up in South Pass City I have a lot of freedom because I can go out in the desert. And while there is oil and gas development going on in



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the Red Desert, I can still go out in the desert and have my own kind of recreation. But that's quality of life. But it's not really demonstrated in this document.

So I think when I talk about wilderness, when I talk about cultural resources, I am talking about quality of life and I am not talking about oil and gas fields or how much money or what the tax base is. When I am talking about quality of life, I am talking about something like that and that's something that is important to be put in this document.

Thanks for the opportunity to speak here tonight.

HEARING OFFICER MONROE: Thanks, Mr. Massie. The next person is Donald A. Smith.

MR. SMITH: My name is Donald A. Smith. I am here representing myself. My profession I am a mining engineer. I am a westerner. I have lived in western United States my entire life. When I read this plan, I was not too pleased with it. My displeasures were very much the opposite of the previous speaker.

I have done a little research in recent times in connection with another matter where I have



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quantified the amount of wilderness that we have in our state, in our region. The state of Wyoming at the present time has 4.992 percent of its land area tied up in wilderness. Of all the wilderness in the Forest Service system, which amounts to some 28-plus million acres, Wyoming has about 1.1 million acres of this, or of the total Forest Service wilderness, we have in our boundaries 10.8 percent of the total. I feel that this price is too much to pay for our citizens, for our job opportunities, for our way of life.

In this region, this wilderness that we are talking about, 80 percent of it is in our immediate locale, in the counties of Fremont, Park, Teton and Sublette and a little bit of Lincoln. This land that's tied up in wilderness is being taken out of production for the economic benefit not only of the people working in the several industries which are dependent upon this, but for the general tax base.

In my industry, I know that for every job we have in the industry, we create approximately five more jobs to serve the people that are working in the industry itself. If we let our traditional industries which we have been dependent on this state since the very beginning fall into disuse for putting



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the land into wilderness so that somebody can get some solitude which they could get just as well in a jail cell. We are doing so at the detriment of all the people in our community and our state.

I just got some information today. 43 percent of the tax base in the state of Wyoming is attributable to the mineral industry, which, of course, includes oil and gas. Somewhat close to 80 percent of the taxes that are paid in this state come from the same set of industries. Certainly anybody that looks at these kind of figures must come to realize that a healthy mineral industry, oil and gas industry, timber industry and agriculture which are our primary sources of internal revenue must be preserved.

Anybody can recreate in almost any kind of land under almost any kind of conditions. I have lived in a good part of the world at various times. You can find recreational opportunities anywhere from the top of the highest mountain to the seashore and below it.

We cannot afford, this state cannot afford to lock up its potentials in wilderness to the detriment of the state. And that's precisely what is being proposed. I submit that we cannot in this



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1 state afford one more square inch of wilderness
2 within our boundaries.

3 On top of the wilderness that we are saddled
4 with, we also have about two and a half million acres
5 of national park which is taken out of production for
6 the benefit of everybody as well.

7 I didn't realize when I put an X on the
8 paper that I was going to be following the gentleman
9 that just spoke. But he brought up a number of
10 points I would like to refute.

11 I guess everybody is aware if they listened
12 to the radio, read the newspaper, at the present time
13 in the United States our balance of payments is
14 negative in the amount of about a hundred and fifty
15 billion dollars a year. We are at the present time
16 importing somewhere between 50 and 60 percent of our
17 petroleum needs. Certainly under those circumstances
18 we would be highly foolish to exclude any area that
19 had a reasonable petroleum potential from exploration.

20 It's been said very recently by somebody
21 that if we were to get into a war of the magnitude of
22 World War Two, we would not have the petroleum to
23 keep us going for six months at the present state of
24 development. Now, lots of people will say, "Yes,
25 that's fine. We got through the last one." They



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1 will say, "Well, if that happens, we can go and do
2 this exploration and do this development." But there
3 is a very long lag time between the time that you do
4 the first seismic work and you have a producing oil
5 field. It's about ten times longer in the case of
6 hard rock minerals.

7 It's essential not only for the good of the
8 citizens of our state but for the security of our
9 country that our mineral and petroleum resources be
10 explored, be ready for production at the time that
11 they shall be needed. There is only one way to do
12 this and that's to get out on the land and do the
13 foot work that's necessary to make these
14 determinations.

15 So, in summary, I feel that under the
16 circumstances that we are in, both economically and
17 because of the overwhelming burden that our state now
18 is suffering under from wilderness and national park,
19 that no more wilderness should be assigned within our
20 boundaries.

21 HEARING OFFICER MONROE: Thank you, sir.
22 Appreciate your taking the time to come over.

23 Does anyone else in the audience wish to
24 offer oral comments?

25 MR. WOLTERSDORF: Yes, I would.



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HEARING OFFICER MONROE: Sir.

MR. WOLTERSDORF: I didn't realize that you had to have a special X on it or a special statement. But I would like to give a comment or two.

HEARING OFFICER MONROE: Would you identify yourself?

MR. WOLTERSDORF: My name is Don Wolterdorf. I am a real estate appraiser in Lander, Wyoming. I would like to give you a little background on myself before I make my statement.

I was raised in the state of Wyoming. I first came here as a little boy about four years old in 1920, in the twenties, early twenties, '21. And I observed the federal lands in the state of Wyoming most of my life. I have spent most of my life in the state of Wyoming. I am a graduate of the University of Wyoming.

I can remember when we had public domain. We didn't have anybody like you people at all -- the public domain. Then we had Taylor Grazing. I want to emphasize the word "grazing." In other words, the most important use the lands that you administer were Grazing. That's the forerunner of your organization, the Taylor Grazing. Of course, I also understand that you absorbed the General Land Office. I am also



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an Engineer so I understand that.

HEARING OFFICER MONROE: And the Surveyor General.

MR. WOLTERSDORF: And the surveyor, yeah. But having lived in Wyoming, I have worked all over the state of Wyoming and observed Wyoming from A to Z, top to bottom. I have hunted and fished. I have roamed all over the state. And wilderness to me -- I agree with this second speaker totally. We have enough wilderness to last us forever. As far as I am concerned, we don't need any more wilderness. As a matter of fact, my understanding of wilderness is that it's untrampled by man. It's pristine. And I don't think there is one square inch of BLM land in fits that category. And a lot of forest land now doesn't. I am sure of that because we got signs on our lakes says "Don't drink the water." And I never had that when I was a young man.

But my main point is after saying this that I want to congratulate you as I understand your recommendation that you're recommending no more wilderness in BLM land. Is that correct?

MR. KELLY: Of the six areas that are addressed in that document, there is one of the WAs that are recommended for partial wilderness that Mr.



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Nessie mentioned.

MR. WALTERSDORF: I want to compliment you on the recommendation position of no more wilderness, because the man that was -- the first man to speak talked about recreation vehicles on the lands that you were studying. Now, to me, if that's wilderness -- if a recreational vehicle can get on the land, how can that be wilderness?

I am getting so I can't hardly go to wilderness areas anymore, well, I consider wilderness because I get to the point that I can't physically go. But when you can drive a recreational vehicle on the land that you are studying, how can that be wilderness? And I think, too, also, that the federal lands and the state of Wyoming have a very strong effect on our economy and they probably have a more -- well, they have at least equal effect of all the private lands on all our economy and maybe even more so. When you consider the oil and gas and minerals, they probably have a more -- a stronger effect. And I happen to be one that likes to see people be able to make a living here to enjoy the wilderness.

Thank you very much.

HEARING OFFICER MONROE: Thank you, sir.

Would anyone else care to offer testimony?

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tonight?

MR. ENGELS: Could I ask a question?

HEARING OFFICER MONROE: Yes, sir.

MR. ENGELS: My name is David Engels.

I am from Lander. I am not sure of the reading in the book of the wilderness supplement. Am I correct in assuming that at the moment the BLM does not administer any wilderness land in Wyoming?

HEARING OFFICER MONROE: That's correct.

MR. ENGELS: Does it administer wilderness anywhere in any other state?

HEARING OFFICER MONROE: Yes, sir, it does.

MR. ENGELS: Is that right?

HEARING OFFICER MONROE: No, not -- unless there were some instantly created areas by legislation, we have some wilderness in Oregon that I know of, Utah, Colorado -- no, not Utah yet; Colorado; Arizona, yes. The Bureau's first wilderness study, designated wilderness area was in Arizona.

MR. ENGELS: Okay. Help me resolve a household dispute. When -- if an area were designated a wilderness area such as, for example, Sweetwater County, does that require more work than the present status quo or less?

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1 HEARING OFFICER MORRIS: Depends on the
2 management plan for a given area. You can't say just
3 planning that it requires more or less work.

4 MR. ENGELS: Thank you.

5 HEARING OFFICER MORRIS: Anyone else
6 care to ask questions or offer testimony? As I did
7 say, the record will be open until the 14th of
8 February for any written comments.

9 Sir?

10 MR. KENDALL: I am not familiar with
11 the format of this meeting and who gives testimony
12 and how this -- I have some questions that come to
13 mind after talking to the speakers. But is this the
14 proper time to ask or --

15 HEARING OFFICER MORRIS: Well, at the
16 conclusion of the formal hearing, Jack Keller and the
17 staff here from the Lander Resource Area or from the
18 Bawins District would be able to respond to any of
19 your questions. But this is supposed to be a formal
20 hearing that just accepts information.

21 MR. KENDALL: Okay.

22 HEARING OFFICER MORRIS: But a lot of
23 the staff are here and would be very happy to talk to
24 you on the issue.

25 MR. KENDALL: I would just then make a



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1 comment then.

2 HEARING OFFICER MORRIS: Could you
3 identify yourself for the record?

4 MR. KENDALL: Yeah. My name is Rob
5 Kendall. I live in Riverton and I came over. I work
6 for a company that's involved in the minerals
7 business, and I just had some questions on some
8 things that I thought would be brought up here.

9 One of the first things that comes to my
10 mind when we were examining the wilderness issue, is,
11 like the gentleman that just spoke, wilderness has
12 such a pristine name, you know, you assume that -- it
13 brings many connotations.

14 But when we think about it, I would wonder
15 who could use the wilderness. Can the aged people
16 use it? Can anybody that has a handicap utilize the
17 wilderness? Can anybody that can't hike five or ten
18 miles use it? And I think these are concerns that we
19 almost have to have ourselves as we place more and
20 more of our lands into this type of holding. Can the
21 people that don't have the money or the time to come
22 out here and buy nice backpacking gear, whatever, can
23 they utilize those things?

24 Fortunately, I am young and I can. But I
25 know a lot of people that can't. And I think that's



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something that we need to examine.

The first speaker addressed the social impact if we allowed development to come to this area, how -- some of the very terrible things, you know, that might happen, the things that I can see might happen that might occur if we do allow development in oil and gas and whatever I think would be the unemployment would go down, the foreclosures would go down, the taxes would go down, the filing for bankruptcy would go down. And I think, you know, that those should be listed in our concerns of quality of life.

I have worked near Jeffrey City and I know many of the people in Jeffrey City and I think we could ask them some real heart-rending questions about their quality of life if that's our concern with wilderness.

I think that most of the other comments that I would like to make would be probably addressed better and asked of people, the gentlemen here with BLM when we have a question-and-answer period. And that's all I really have to say right now. But those are the some concerns we have to think about when we consider wilderness.

HEARING OFFICER MORRIS: Thank you.



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Well, if there are no other persons who wish to offer testimony, the hearing will now be closed. And as I said, the hearing is open until the 14th of February. And any comments that anyone cares to make on the draft plan will be welcome at that time.

The hearing is now closed. Thank you all for coming.

[Hearing proceedings concluded
7:43 p.m., December 12, 1985.]



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C E R T I F I C A T E

I, JOHN E. WALE, a Registered Professional Reporter, do hereby certify that I reported by machine shorthand the proceedings contained herein and that the foregoing 34 pages constitute a full, true and correct transcript.

Dated this 31st day of December, 1985.

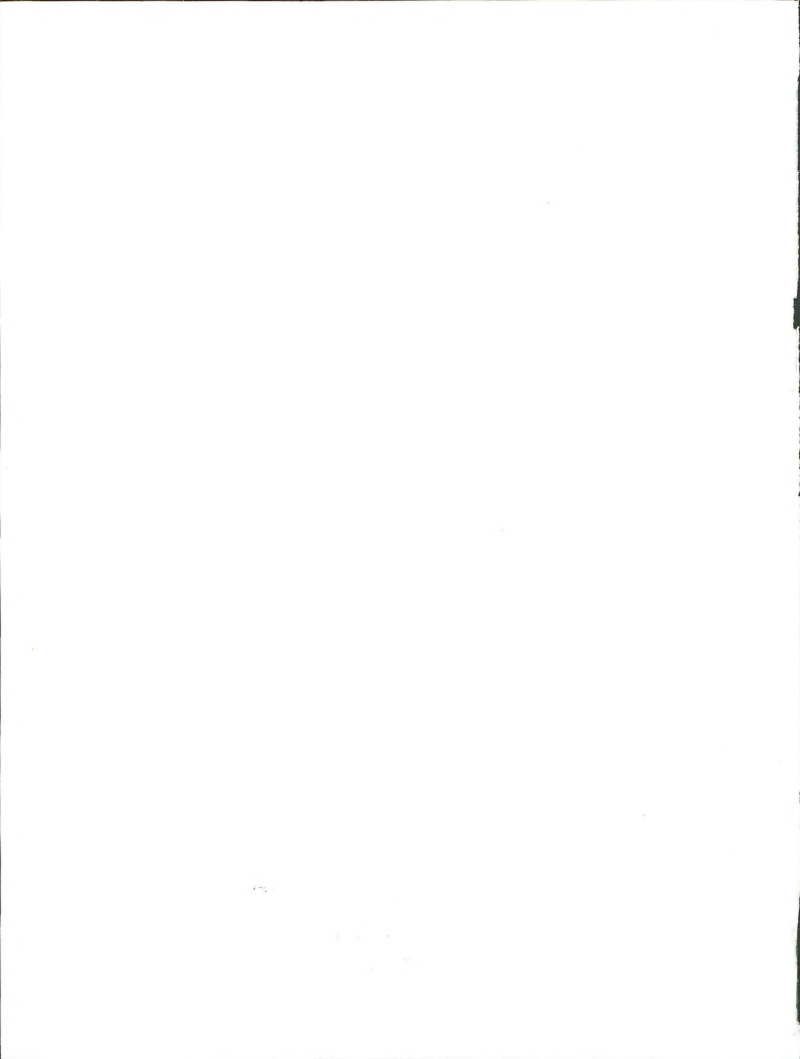
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